

The Crisis in the Cleanup of the Santa Susana Field Laboratory



BY DANIEL HIRSCH

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ENVIRONMENTAL AND NUCLEAR POLICY,
UC SANTA CRUZ
PRESIDENT, COMMITTEE TO BRIDGE THE GAP**

FEBRUARY 13, 2020

The Fundamental Message



Remember the
Golden Rule

REMEMBER THE GOLDEN
RULE... WE MUST ALL
LIVE BY THE GOLDEN
RULE.



E. 9

WHAT THE
HECK IS THE
GOLDEN
RULE?

WHOEVER HAS
THE GOLD
MAKES THE
RULES.




EXTERNALITIES:



Transferring the Cost of Doing Business Onto Others

It is often cheaper for corporations and others to pollute because they are allowed to externalize environmental and social costs. Rather than pay to prevent pollution, or to clean it up, *they transfer the cost to innocent others in the form of health impacts.*



Grace was diagnosed with cancer in 2014, only weeks after her fourth birthday. She spent over one hundred days inpatient the first year of treatment and had chemotherapy 10x above standard treatment.


Grace relapsed in August of 2017, spending another six weeks inpatient while receiving strong chemo and four days of twice-a-day radiation.

After a bone marrow transplant in 2017, Grace, now ten, is cancer free.



Grace, PH+ Leukemia

Source: Parents vs SSFL <https://parentsagainstssfl.com/our-kids>



Hazel was diagnosed with stage three neuroblastoma, an incredibly aggressive and dangerous cancer, when she was two years-old in 2013.

In March of 2018, at just 7 years old, Hazel passed away.



Hazel, Neuroblastoma

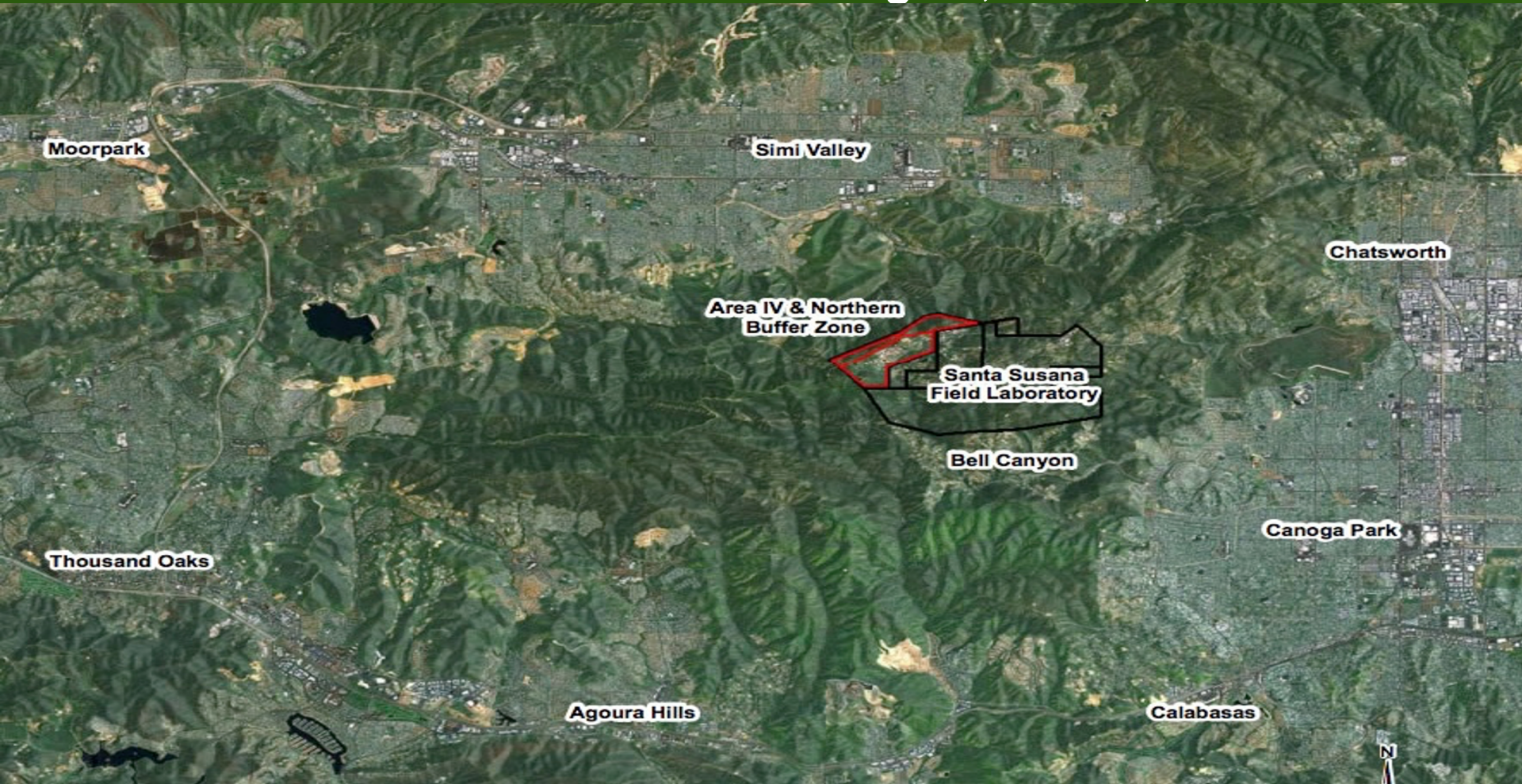
Source: Parents vs SSFL <https://parentsagainstssfl.com/our-kids>

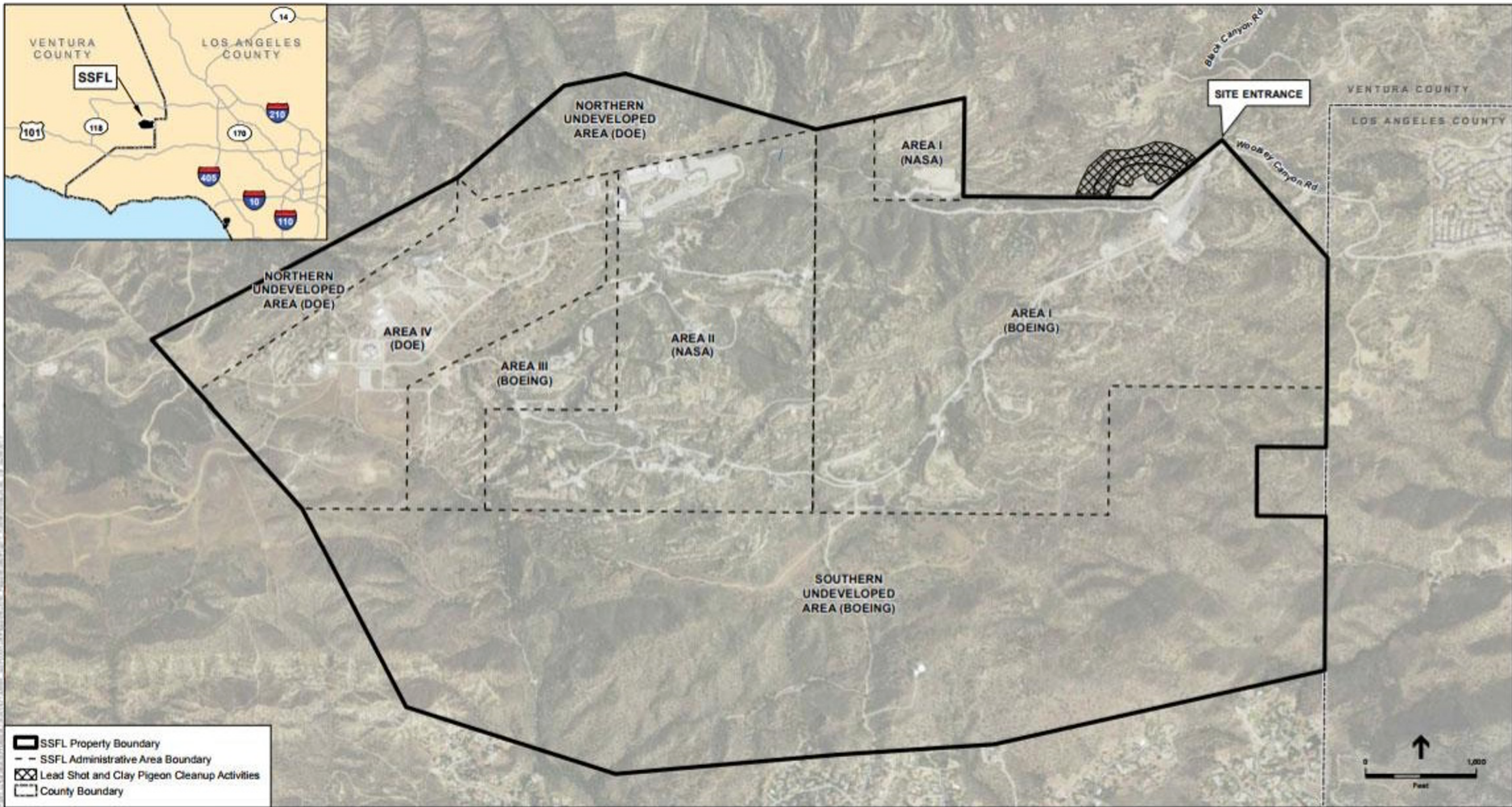
Santa Susana Field Laboratory



**RESPONSIBLE
PARTIES: DOE, NASA,
AND THE BOEING
COMPANY**

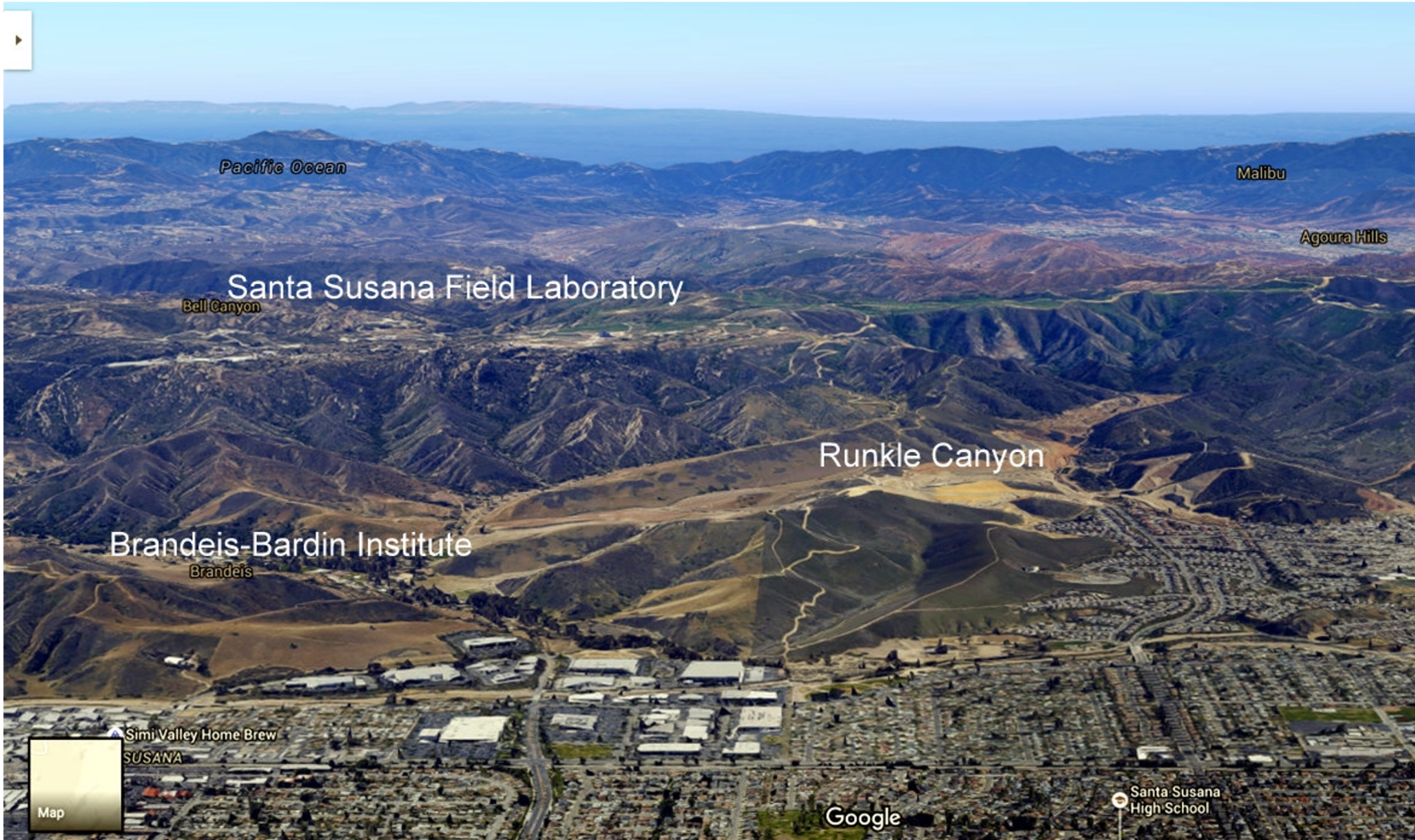
SSFL Location – Elevation range 2,245– 1,175 feet





SSFL Property Boundary
SSFL Administrative Area Boundary
Lead Shot and Clay Pigeon Cleanup Activities
County Boundary





Pacific Ocean

Malibu

Agoura Hills

Santa Susana Field Laboratory

Bell Canyon

Runkle Canyon

Brandeis-Bardin Institute

Brandeis

Simi Valley Home Brew

SUSANA

Google

Santa Susana
High School

Map

Space Preserve

Bell Canyon

Brandeis

Callahan Field

Simi Valley Cu

Sequoia Park

Garden Grove



SSFL History

Established in late 1940s for rocket testing

In 1949, Atomic Energy Commission undertook a search for a remote nuclear testing lab for work too dangerous to do in populated areas

Site was to be in area where population development was unlikely

SSFL ranked 5th out of 6 for meteorological safety criteria

Picked anyway, because of driving time to UCLA

UNCLASSIFIED



NAA-SR-30

Subject Category: BIOLOGY

UNITED STATES ATOMIC ENERGY COMMISSION

GENERAL REACTOR SITE SURVEY OF THE
LOS ANGELES AREA

By
R. G. Chalker

UNIVERSITY OF CALIFORNIA
LIBRARY
MAY 9 1953
GOVT. PUBL. ROOM

June 1, 1949

North American Aviation, Inc.
Los Angeles

Technical Information Service, Oak Ridge, Tennessee

SSFL History Cont.

- Power of reactors was to be limited so as to reduce dose to nearby population
- A few years later, the limit was set aside and a large test reactor constructed nonetheless (the SRE, the one that had the partial meltdown)
- Now half a million people reside within ten miles





MELTED
BLOB

The image shows a horizontal zirconium rod. A central portion of the rod is irregular and lighter in color, labeled 'MELTED BLOB'. To the left of this blob, the rod is relatively straight. To the right, the rod is bent into a U-shape. Below the rod is a dimension line with three segments. The first segment is labeled '6-3/4"', the second '5"', and the third '6-1/4"'. The label 'ZIRCONIUM' is at the bottom left.

6-3/4"

5"

6-1/4"

ZIRCONIUM

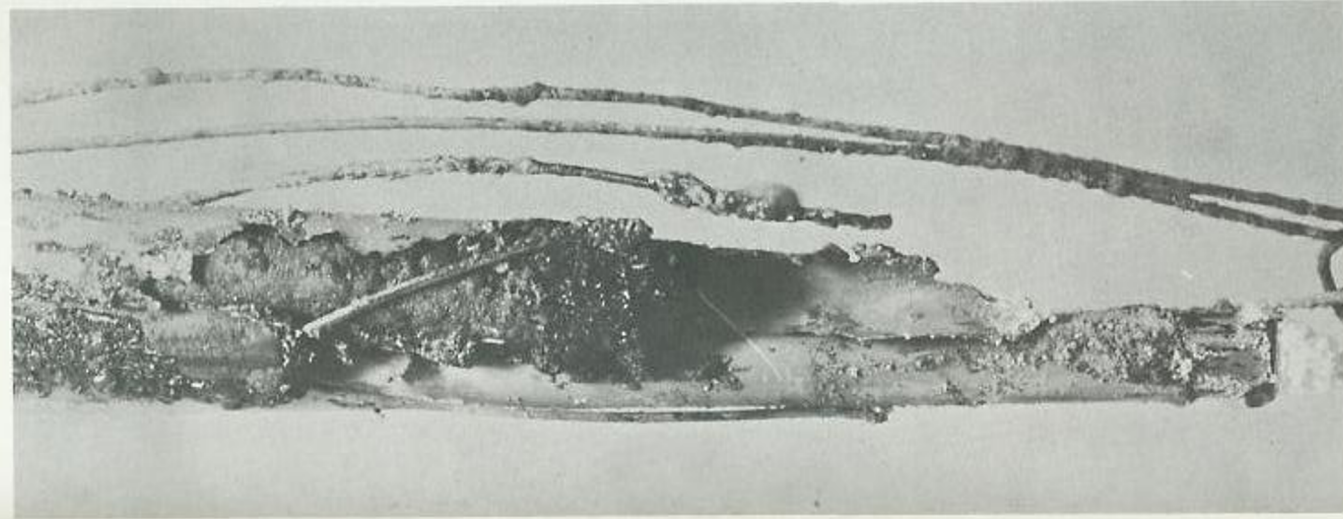


Figure IV-A-6. Bottom of Damaged
Element in Channel 55

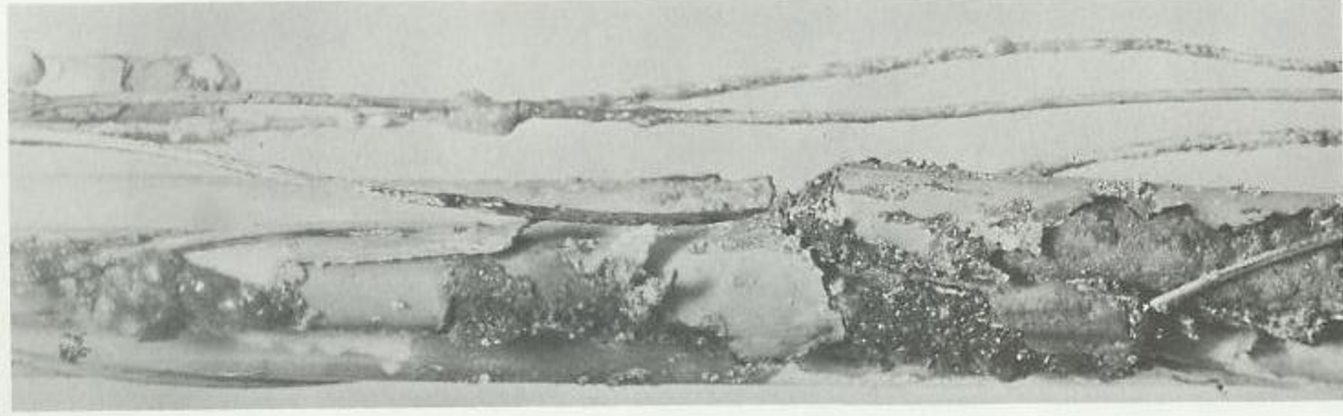
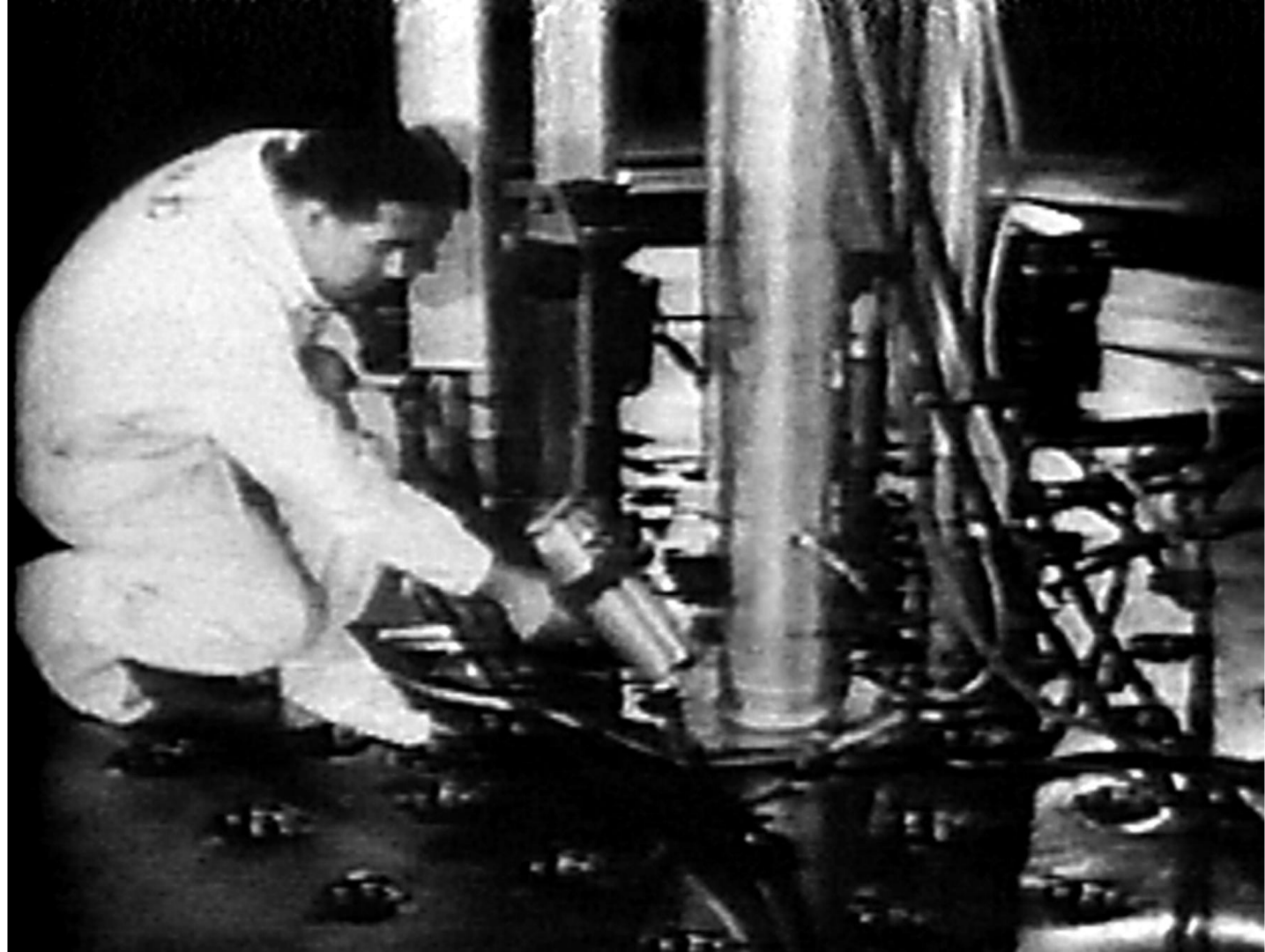
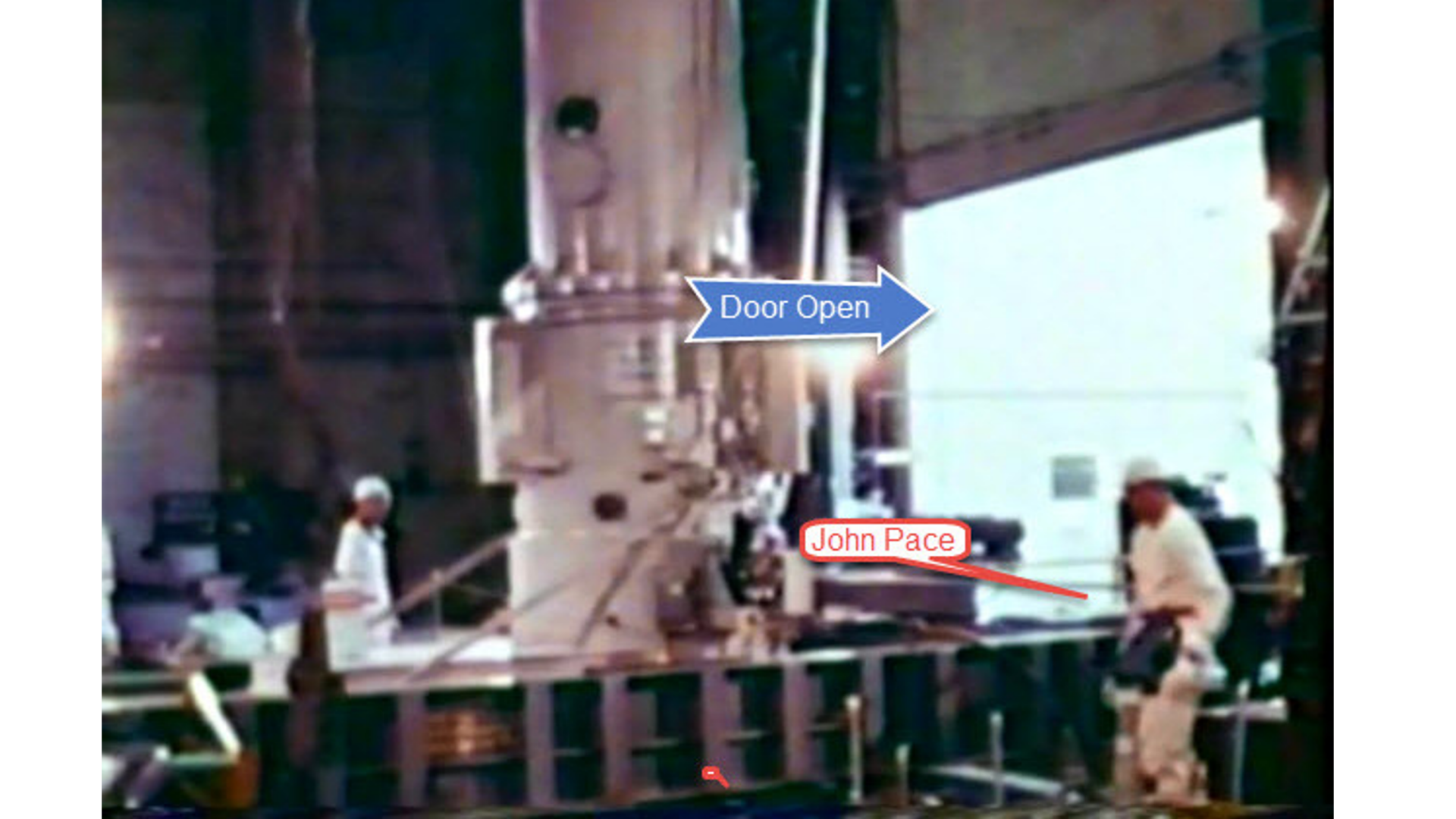


Figure IV-A-7. Midsection
of Damaged Element in
Channel 55







Door Open

John Pace

NUMEROUS OTHER ACCIDENTS AND RELEASES



At least 3 other reactors suffered accidents:

- SNAP8ER—80% of nuclear fuel damaged
- SNAP8DR—35% of fuel damaged
- AE6—release of fission gases

Radioactive Fires at the Hot Lab

Releases from Plutonium Fuel Fabrication

Numerous Other Spills and Releases

SSFL NUCLEAR WORK OCCURRED OVER FOUR DECADES



Over 30,000
rocket engine
tests took place
over five
decades.



Extremely Toxic Chemicals Were Released in the Rocket Work

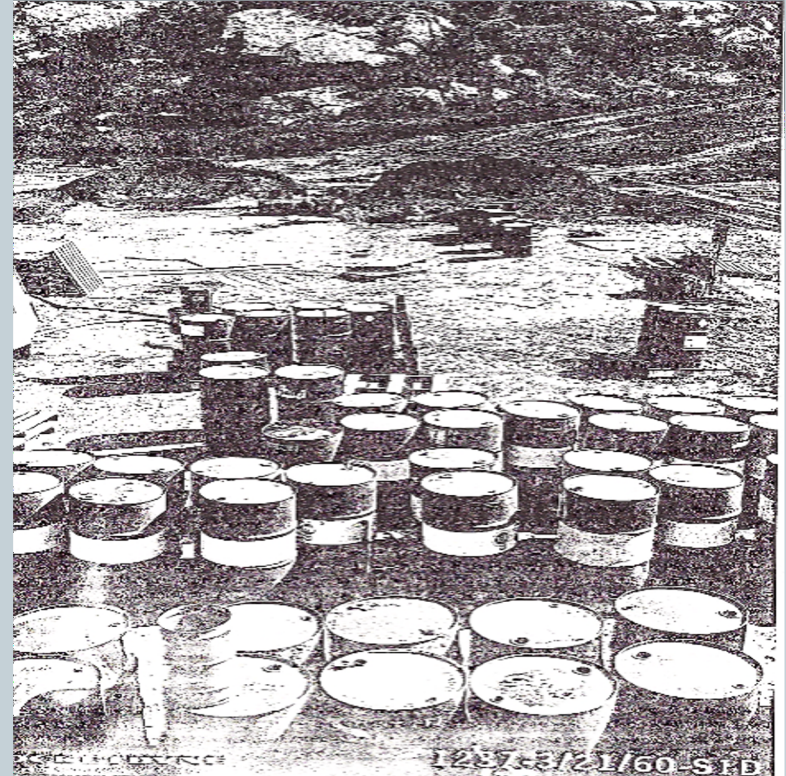


For example, 1 million gallons of TCE were used to flush rocket engines after tests, and then to percolate into the ground and groundwater. It is dangerous in parts per billion. The TCE plume has migrated offsite.

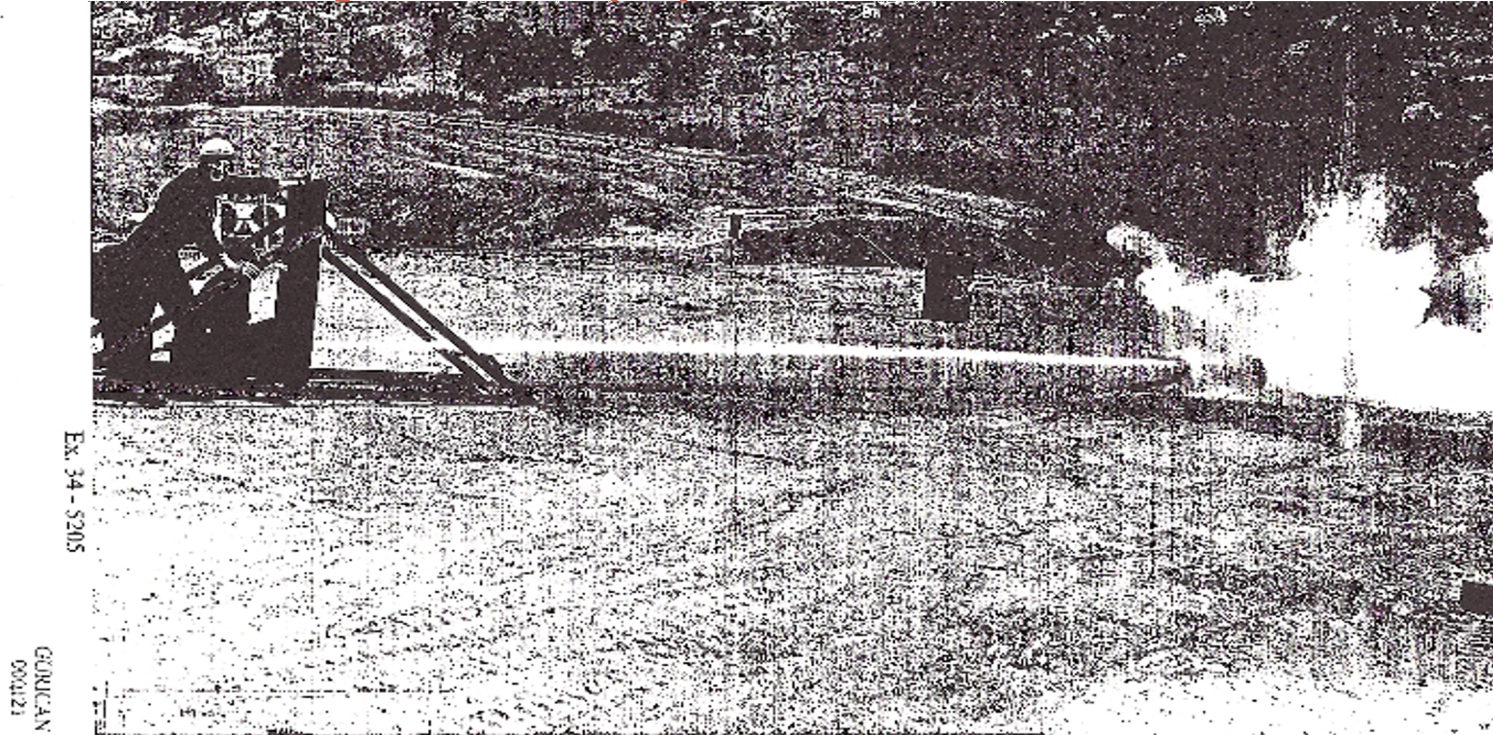
Tons of perchlorate, a component of solid rocket fuels, were used. A state-funded study by Dr. Ali Tabidian found it had apparently migrated offsite and into the Arroyo Simi, infiltrating into groundwater and contaminating numerous wells. Perchlorate's maximum level in water is also measured in parts per billion.

HISTORY OF IMPROPER DISPOSAL OF HAZARDOUS MATERIALS

- Radioactive and chemical materials burned in Area IV sodium burn pit against rules for decades
- Rocketdyne cited for unpermitted burning of hazardous materials in Area I
- In mid-1990s two workers were killed in an explosion caused by illegal disposal of hazardous materials. FBI raided SSFL and US Attorney charged Rocketdyne with 3 felonies, largest environmental fine at the time.



Workers “disposed” of highly toxic waste in barrels by shooting at them, causing them to explode and release contents into the environment, with the contaminants spread widely by toxic smoke.



EX. 34-S205

GOUCAN
000121

Ex. 34 - 5204

GURICAN
000120



SSFL Contaminants of Concern



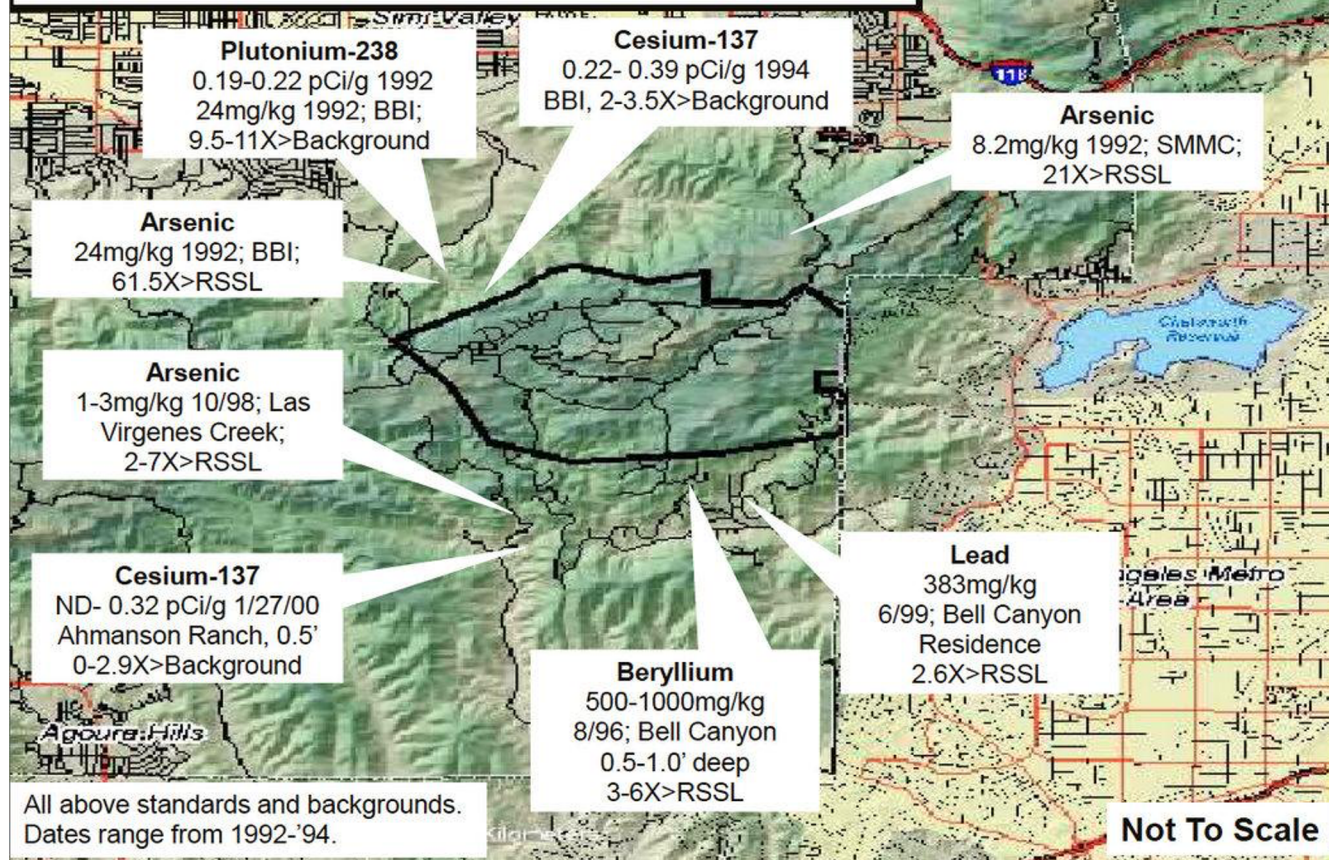
Radionuclides: cesium-137, strontium-90, plutonium-239, tritium, among other radioactive materials. In 2012, the EPA found radiation in hundreds of samples at SSFL, in some places over 1,000 times background. The National Academy of Scientists has concluded there is no safe level of exposure to radiation.

Chemicals: TCE, perchlorate, dioxins, heavy metals, PCBs, and various other volatile and semi-volatile organics. Many are regulated at a few parts per billion (ppb), yet there are very large quantities present in the soil at SSFL. SSFL disposed of tons of perchlorate in open-air burn pits which polluted soil, groundwater and surface water. At SSFL, 500,000 gallons of TCE are estimated to be in the soil column and aquifer.

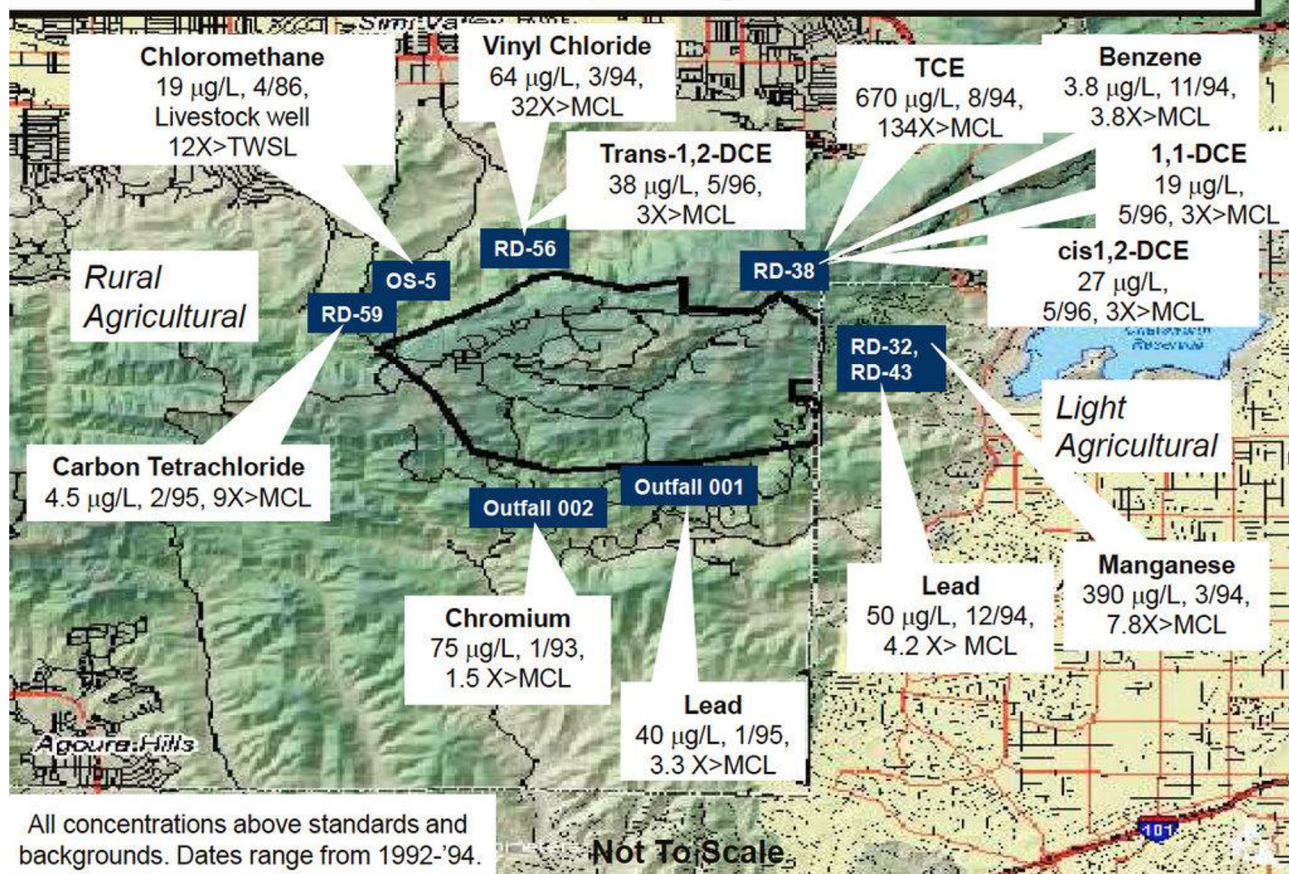
Radionuclide	Health/Environmental Effects
Tritium	Linked to developmental problems, reproductive problems, genetic abnormalities.
Radium	Lymphoma, bone cancer, leukemia, aplastic anemia linked with inhalation. Other cancers with external exposure.
Technetium-99	Cancer linked to ingestion (contaminated food and water).
Iodine-131	Linked to thyroid malfunction/cancer. Combines with soil and organic materials easily.
Cesium-137	Can cause cancer 10 – 30 years after ingestion, inhalation, or absorption. Moves easily in environment, difficult to clean up.
Strontium-90	Chemically similar to calcium. Can cause bone cancer, cancer near bones, and leukemia.
Plutonium	Contaminant in dust. Extreme risk of cancers, kidney damage. Can stay in the body for decades.

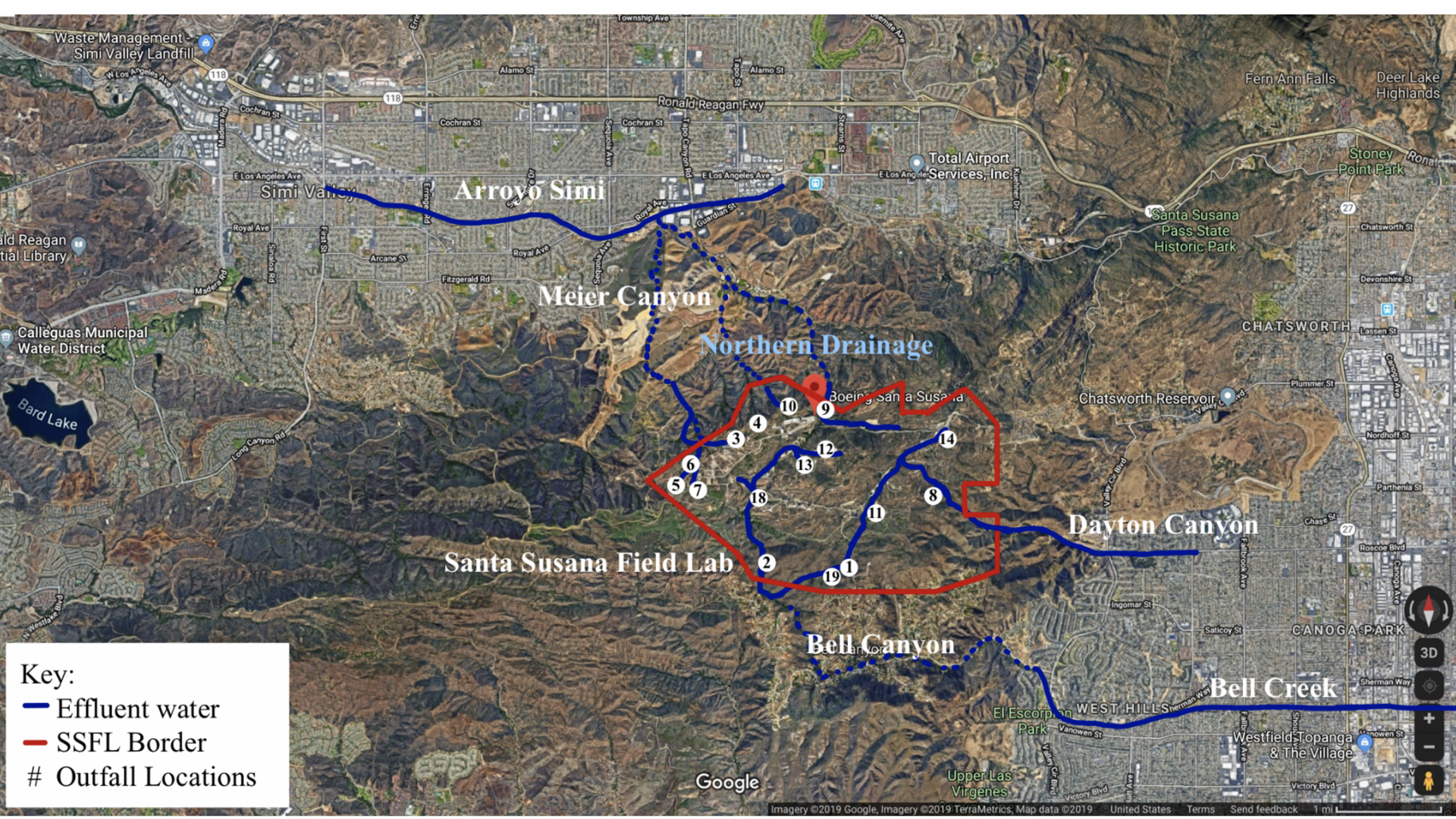
Chemical	Health/Environmental Effects
TCE	Impaired immune system function, damage liver and kidney, impaired fetal development. In larger amounts it may cause impaired heart function, unconsciousness and death
Perchlorate	Interferes with iodide uptake into the thyroid gland, causing hypothyroidism in mothers and negatively impacting proper childhood development such as decreased learning capability.
Dioxins	Carcinogenic and can cause reproductive, developmental, immunological, and endocrine side effects
PCBs	Can serious effects on the liver, immune, endocrine, and reproductive are classified as a probable carcinogen
Lead	Linked with learning disabilities, infertility, cancer, and increased risk of heart attacks

Offsite Soil Contamination



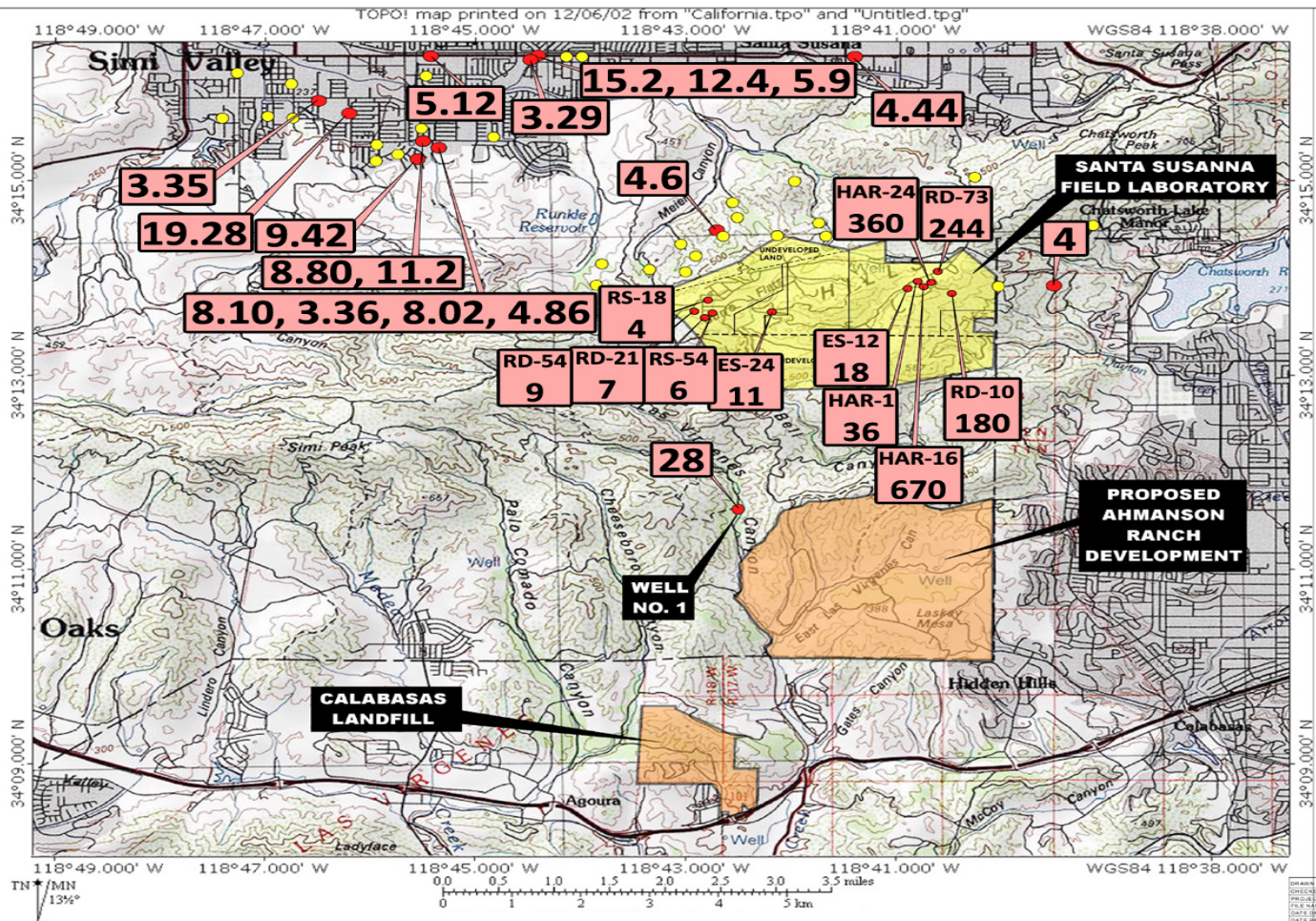
Offsite Wells or Spring Contamination





Key:

- Effluent water
- SSFL Border
- # Outfall Locations



- SAMPLE LOCATIONS
- SAMPLE LOCATIONS W/PERCHLORATE DETECT

4.44 PERCHLORATE CONCENTRATIONS (ppb)

ALL SAMPLE LOCATIONS ARE APPROXIMATE

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Wildflower Productions (www.topo.com)

DRAWN BY: BWS	TITLE: CLIENT LOCATION AND DATA	FIG. NO.: 1
PROJECT NO.: 204.003	LOCATION: SIMI VALLEY, CALIFORNIA	
DATE: 12/06/02	CLIENT: Ahmanson Ranch	
DATE: 12/06/02		



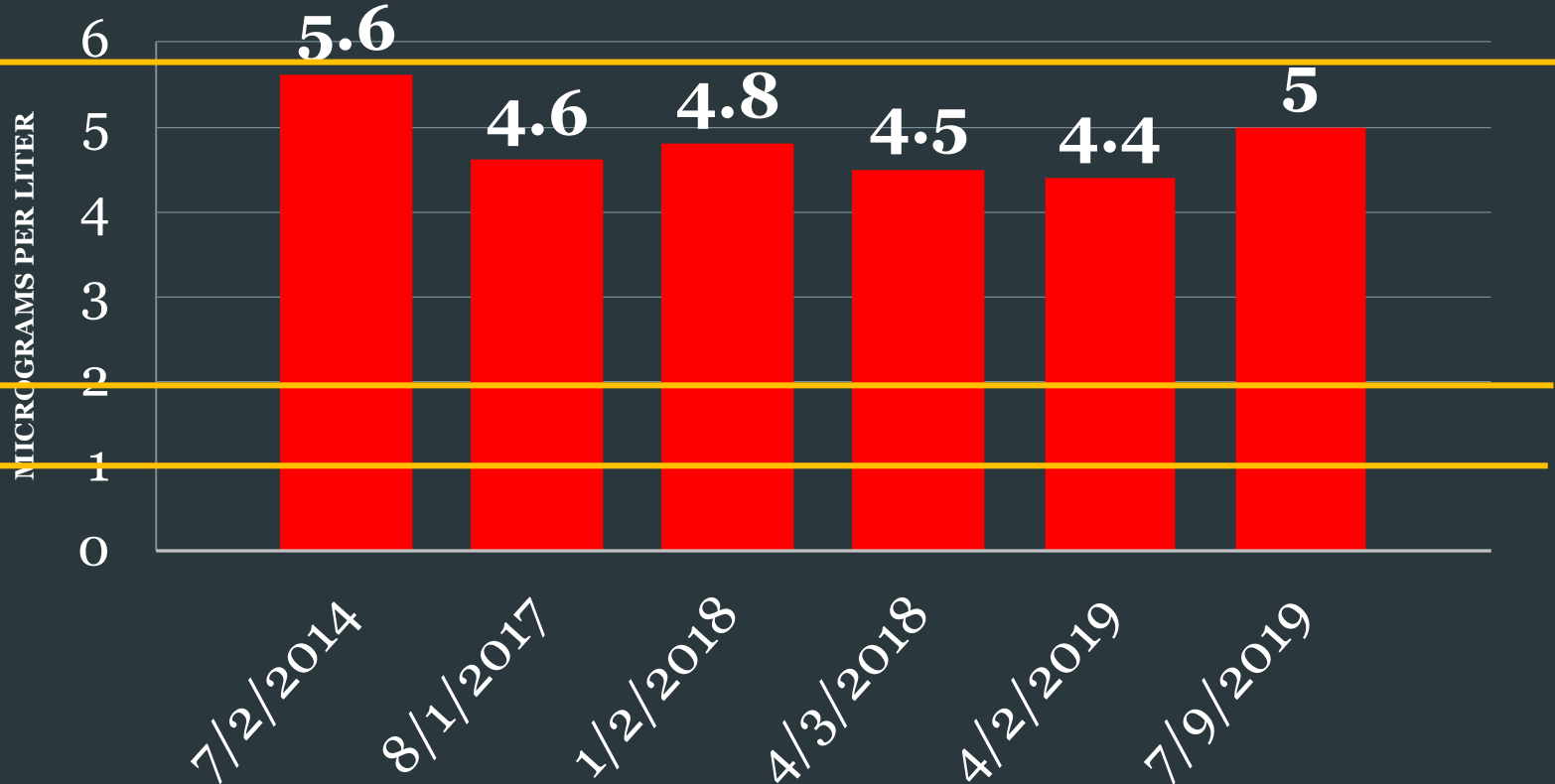
Perchlorate Has Repeatedly
Been Detected in the Sycamore
Well, a Major Water Supply
Well Less Than a Mile From
Where We Are Meeting Tonight

Perchlorate Found in Sycamore Well, Simi Valley

Old CA
Maximum
Contaminant
Limit (MCL)

New CA
proposed MCL

California
Public Health
Goal

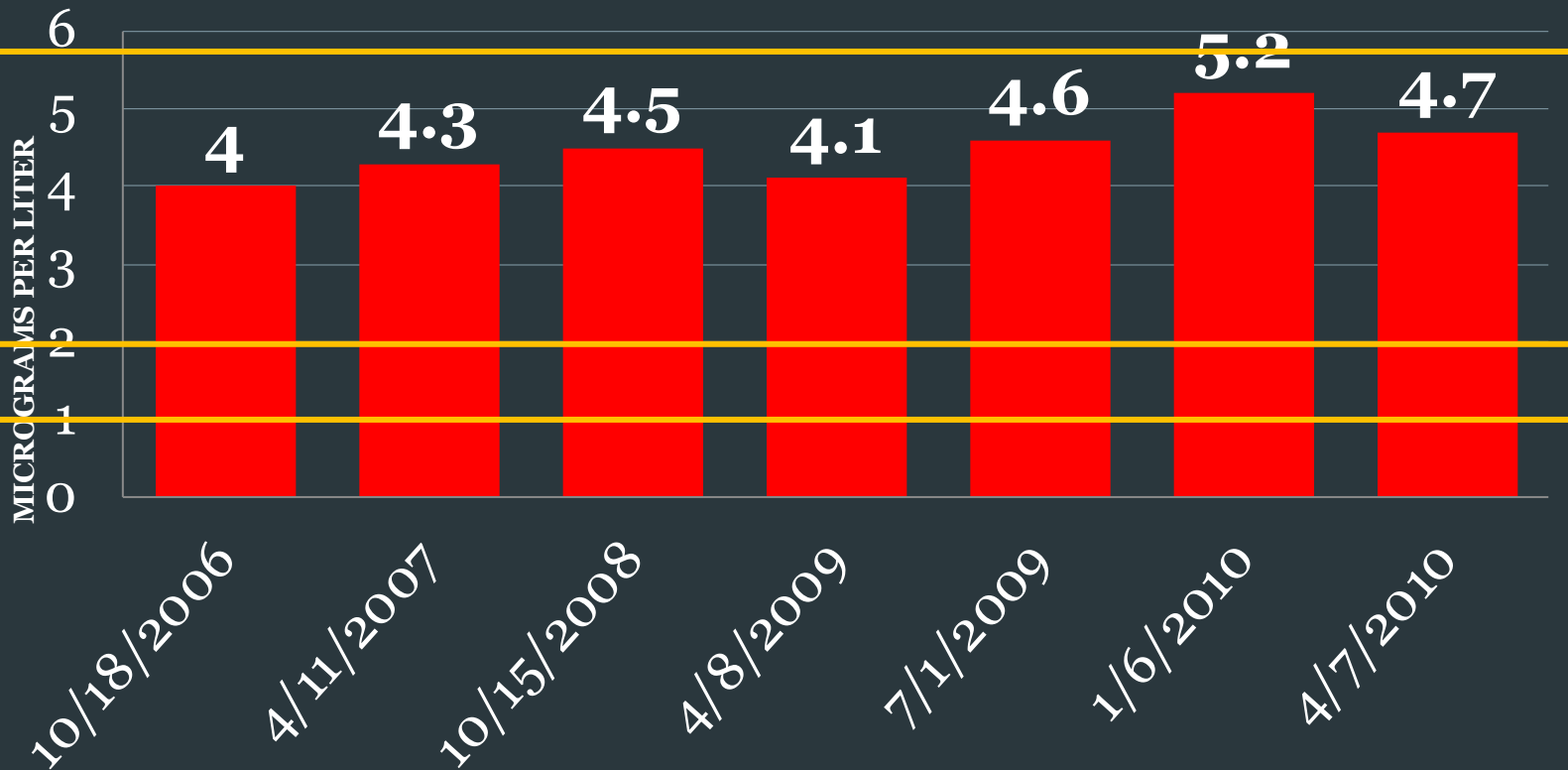



Perchlorate Found in Sycamore Well, Simi Valley

Old CA
Maximum
Contaminant
Limit (MCL)

New CA
proposed MCL

California
Public Health
Goal





In 2015 Boeing released reports showing very high risk in some areas of the site and declaring that much of the property needed no further action. In one area, the report indicates 96 out of 100 people would get cancer (if they lived on the site), and after Boeing's proposed cleanup that number falls to only 5 in 10. Regardless of what becomes of SSFL, leaving that high of contamination on site presents a threat to nearby communities.

8.1.1.2 Garden Use

Another pathway evaluated for the hypothetical future suburban resident is the consumption of homegrown produce that has accumulated COPCs from soil. In accordance with the SRAM Rev. 2 Addendum, only the 0-to-2-foot-bgs soil interval is considered for this scenario. The site risk calculation results for the homegrown produce exposure pathway are provided in Table E1-5. The risk calculation table for background soil is provided in Table E1-6.

For the homegrown produce consumption pathway, the total site ELCR is $>9 \times 10^{-1}$ and the incremental risk is 9×10^{-1} , which is above the USEPA target risk range of 1×10^{-6} to 1×10^{-4} and exceeds the DTSC point of departure of 1×10^{-6} . The main contributors to the site soil ELCR are MMH (92 percent contribution; 9×10^{-1} risk); arsenic (7 percent contribution; 7×10^{-2} risk); and carcinogenic polycyclic aromatic hydrocarbons (1 percent contribution; 7×10^{-3} risk). Risks also exceeded 1×10^{-6} for n-Nitrosodimethylamine (2×10^{-3} risk); 2,3,7,8-TCDD TEQ (6×10^{-4} risk); hexavalent chromium (5×10^{-4} risk); Aroclor-1254 (3×10^{-4} risk); Aroclor-

Boeing's Own Risk Estimates

Source: RCRA Facility Investigation Data Summary and Findings Report Systems Test Laboratory IV RFI Site Boeing RFI Subarea 5/9 South, Santa Susana Field Laboratory, Ventura County, California

BOEING'S OWN RISK ESTIMATES IF A PERSON LIVED AT SSFL



- An astonishing 96 people out of a 100 exposed, at the Systems Test Lab IV, would get a cancer from the contamination on site.
- Every third person exposed at the Environmental Effects Lab would get a cancer from the contamination on site.
- Every fifth person exposed at Happy Valley North would get a cancer from the contamination on site.
- Every tenth person exposed at Compound A site would get a cancer from the contamination on site.

PEDIATRIC CANCERS NEAR SSFL

IS LOS ANGELES'
WORST KEPT SECRET
POISONING
OUR KIDS?



Children show map of pediatric cancers near SSFL at Feb. 21, 2017 Dept. of Energy meeting

SSFL HEALTH STUDIES



- An extensive, multi-year epidemiological study by the UCLA School of Public Health found significant increases in death rates among the most exposed workers from cancers of the lung, lymph, and blood systems.
- Independent federally-funded studies found increased incidence of key cancers in the offsite population associated with proximity to SSFL, and that SSFL contamination has migrated offsite at concentrations above EPA levels of concern.

*“For the period 1988 through 1995, we found that the **incidence of cancer was more than 60% greater among residents** living with 2 miles of SSFL than among residents living more than 5 miles for the following types of cancer: thyroid, upper aerodigestive tract, bladder, and blood and lymph tissue.”*

Professor Hal Morgenstern

BREAKTHROUGH: 2010 SSFL Cleanup Agreements



In 2010, administrative orders on consent (AOCs) were signed between the state department of toxic substances control (DTSC) and the department of energy (DOE) and NASA to clean up their respective portions of the property to background--i.e. Restore it to the condition it was in before being contaminated.

DTSC said that it would also require a comparable level of cleanup for boeing, based on local government's land use designations.

SSFL CLEANUP AGREEMENTS

It was Dr. Steven Chu, the Nobel Prize-winning physicist Secretary of Energy and the Assistant Secretary, Inez Triay, who proposed the agreement to clean up SSFL to background levels.



KEY ASPECTS OF THE 2010 CLEANUP AGREEMENTS



- Requires Soil Cleanup to Local Background
- Soil Defined as Including Dirt, Structures, Debris, and Anthropogenic Materials
- No “Leave in Place” Alternatives Allowed
- All Waste With Radioactivity Above Background Must Be Disposed of in Licensed LLRW Disposal Sites
- Narrowly limited exceptions to cleanup requirements
- **CLEANUP TO BE COMPLETED BY 2017**



Despite the requirement for full cleanup by 2017, it is 2020 and the promised soil cleanup hasn't even begun.

A man with short dark hair, wearing a light blue dress shirt and a patterned tie, is speaking at a podium. He is looking slightly to his right. A microphone is in front of him. In the foreground, the back of a person's head with blonde hair is visible on the right side. The background is a plain, light-colored wall.

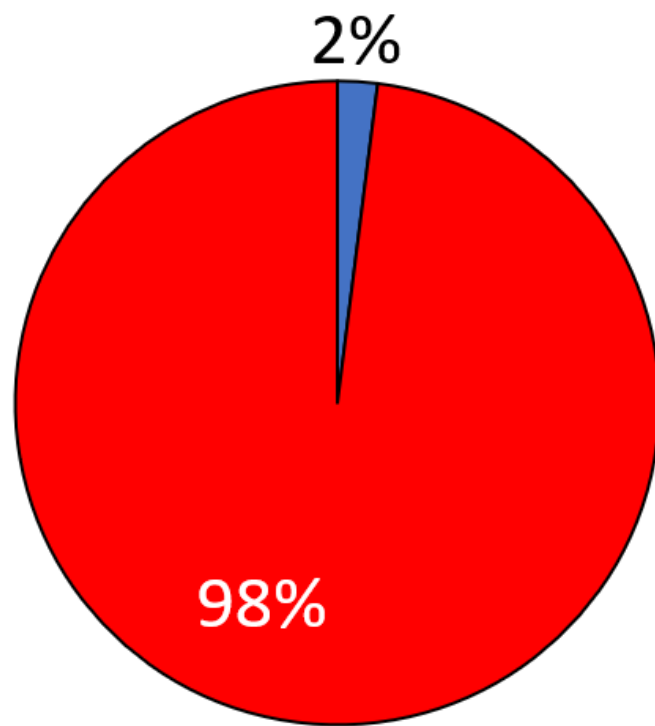
**DOE'S JOHN JONES, SPEAKING BEFORE SSFL WORK
GROUP, FEBRUARY 5, 2014**

DEPT. OF ENERGY BREACHES ITS CLEANUP AGREEMENT



DOE issued a Final Environmental Impact Statement in Nov. 2018, proposing to leave as much as 98% of the contaminated soil not cleaned up.

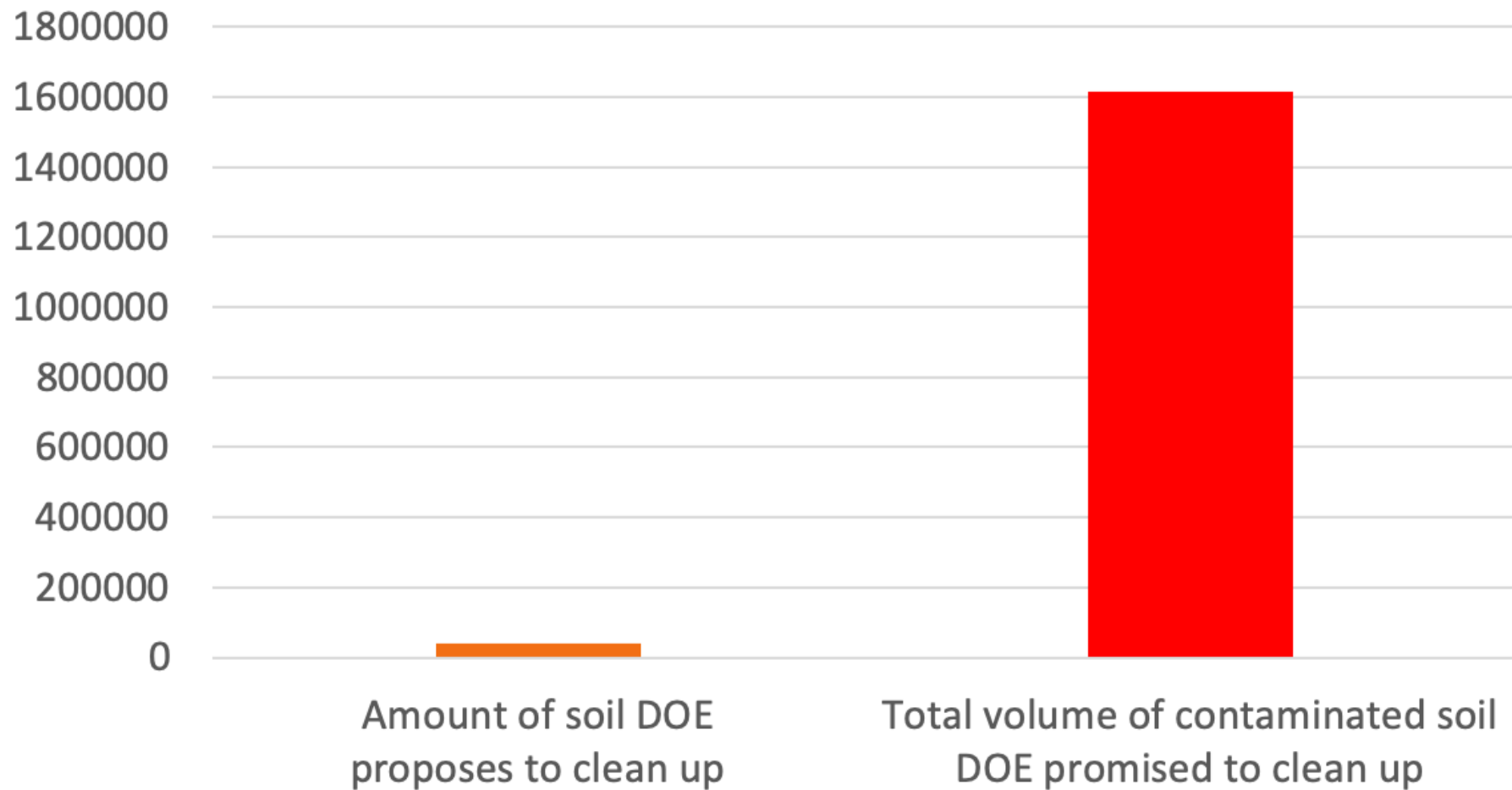
Contaminated Soil vs. Proposed DOE Cleanup



■ Amount of soil DOE proposes to clean up

■ Total volume of soil exceeding AOC Look Up Table values

Contaminated Soil vs. Proposed DOE Cleanup (cubic yards)

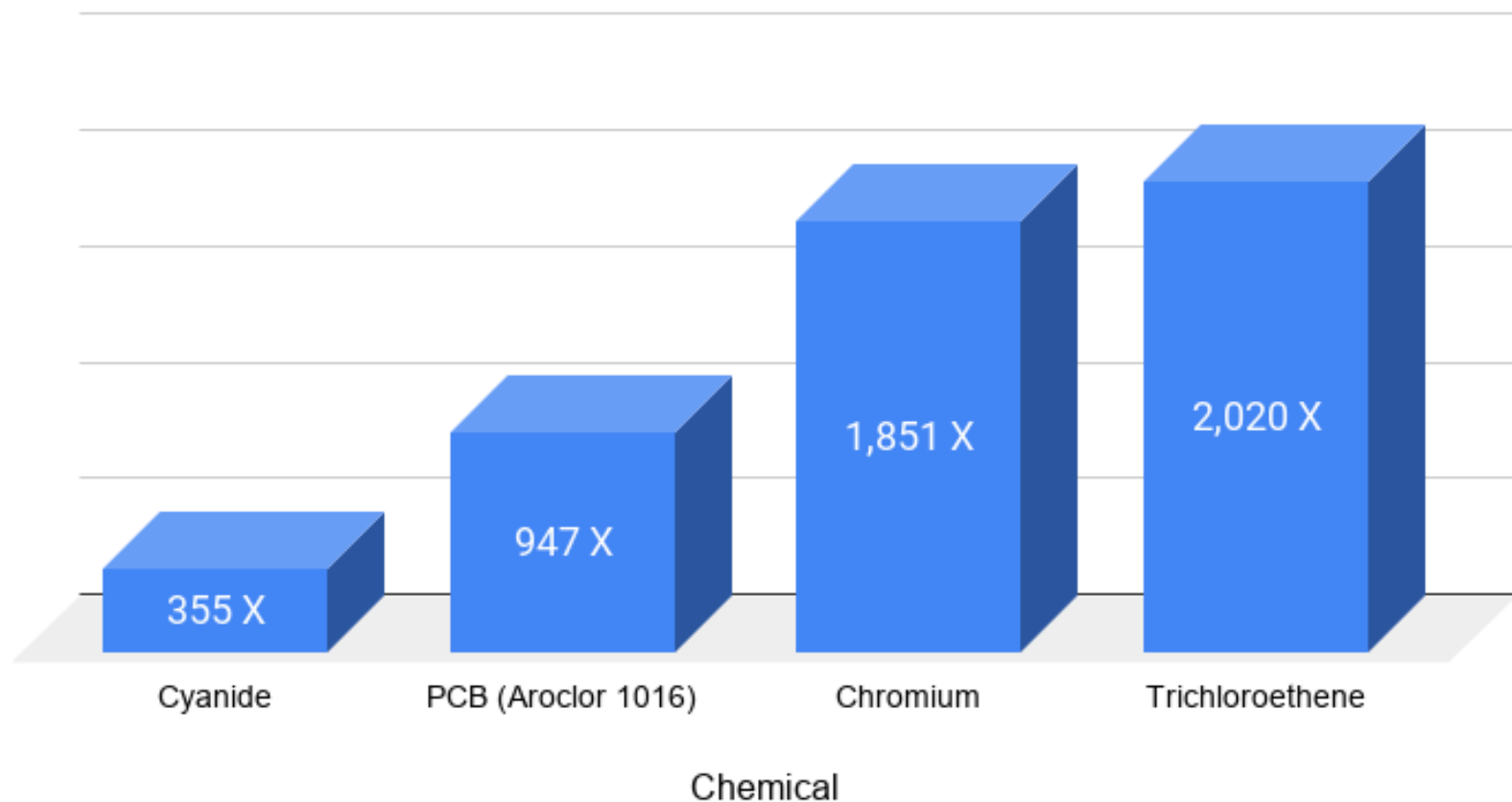


98%

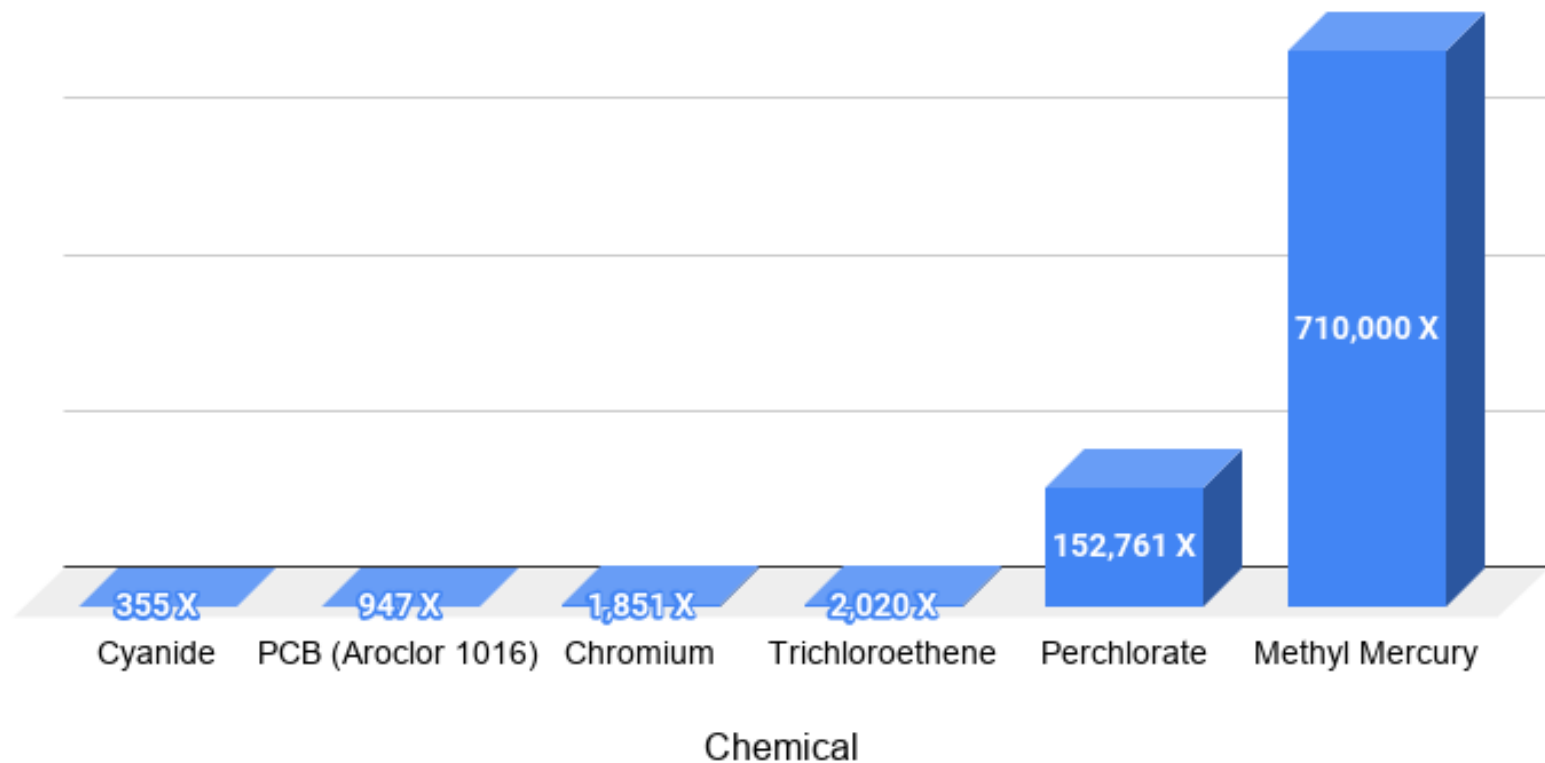
**OF CONTAMINATED SOIL WILL NOT
BE CLEANED UP BY DOE**

Chemical	The Cleanup Level DOE Promised to Meet (mg/kg)	The Cleanup Level ("Recreational") DOE Now Proposes (mg/kg)	How Many Times Higher Levels of Contamination DOE Proposes to Leave Onsite Than Promised
Chromium	94	174000	1,851
Cyanide	0.6	213	355
Methyl Mercury	0.00005	35.5	710,000
PCB (Aroclor 1016)	0.017	16.1	947
Perchlorate	0.00163	249	152,761
Trichloroethene	0.005	10.1	2,020

How Many Times Higher Than Promised Levels of Contamination DOE Proposes to Leave Onsite



How Many Times Higher Than Promised Levels of Contamination DOE Proposes to Leave Onsite



DOE ADMITS THIS WOULD
VIOLATE THE LEGALLY
BINDING 2010
ADMINISTRATIVE ORDER ON
CONSENT IT SIGNED WITH
DTSC

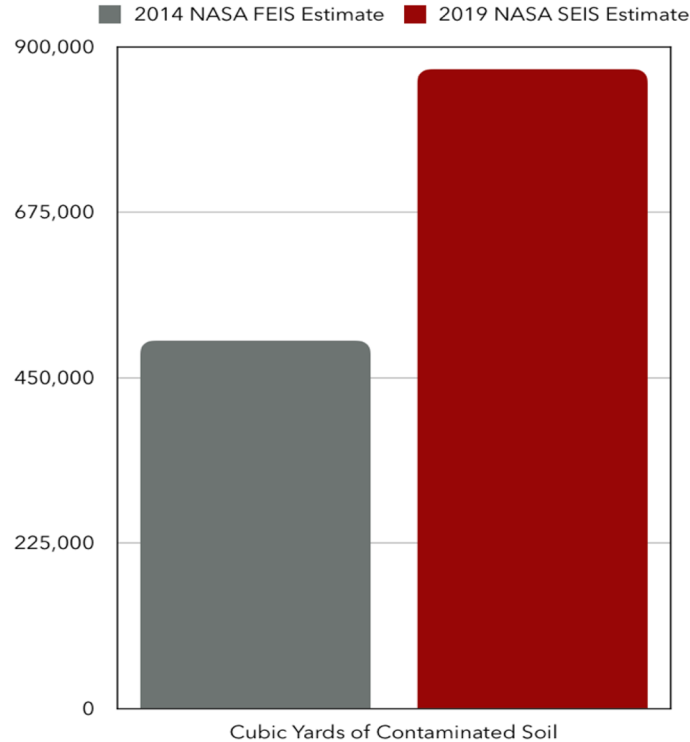
NASA IS ALSO BREAKING ITS CLEANUP AGREEMENT



NASA Just Issued a Draft
Supplemental Environmental
Impact Statement
That Violates Its AOC

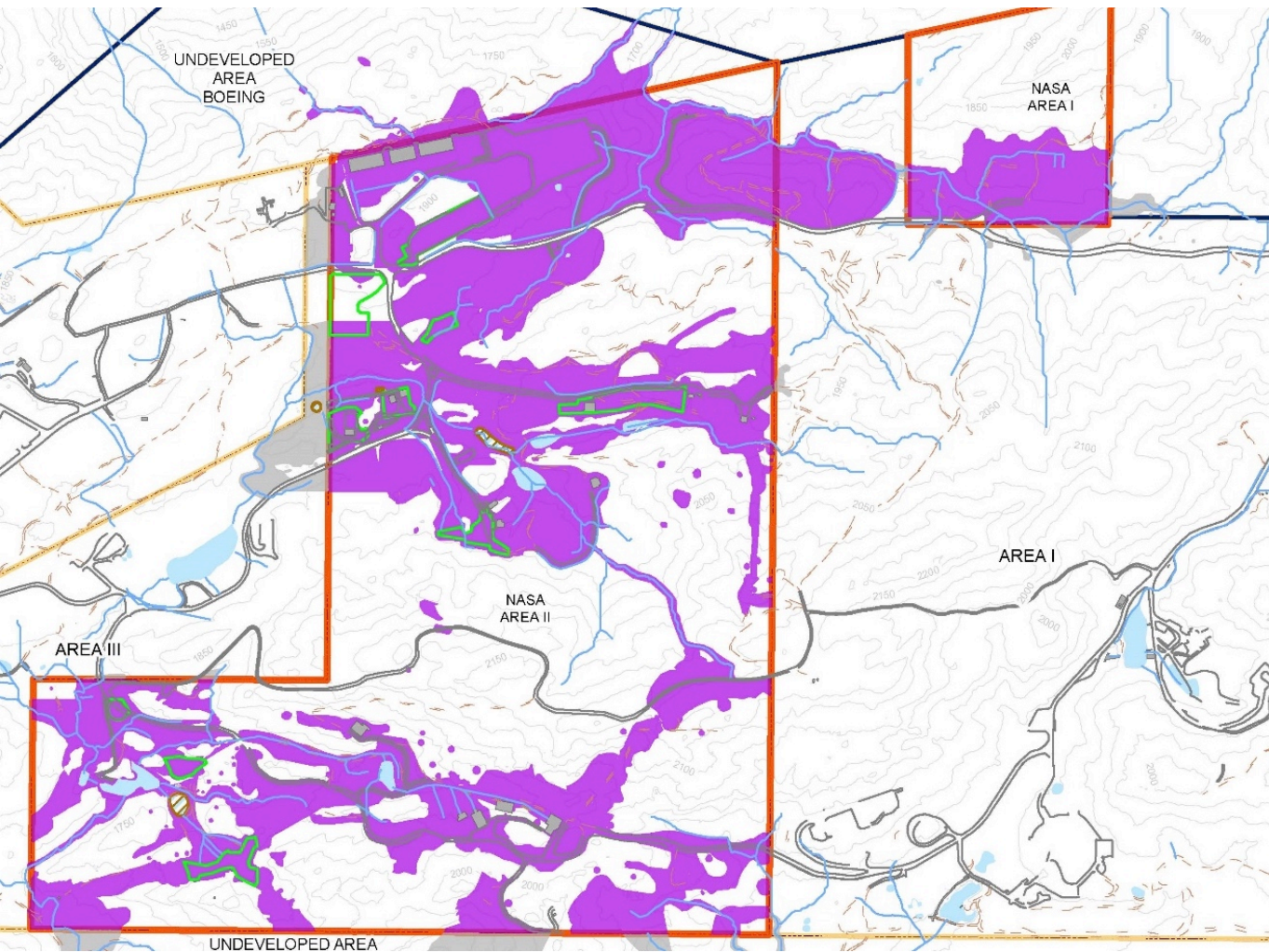
NASA asserts it is preparing the Supplemental EIS because of “significant new information” — primarily that it has discovered that there is much more contamination on its property than it previously estimated.¹ NASA has supposedly “discovered” that there is 75% more contaminated soil than it had thought.

NASA's Increasing Estimates of How Much Soil it Contaminated at SSFL

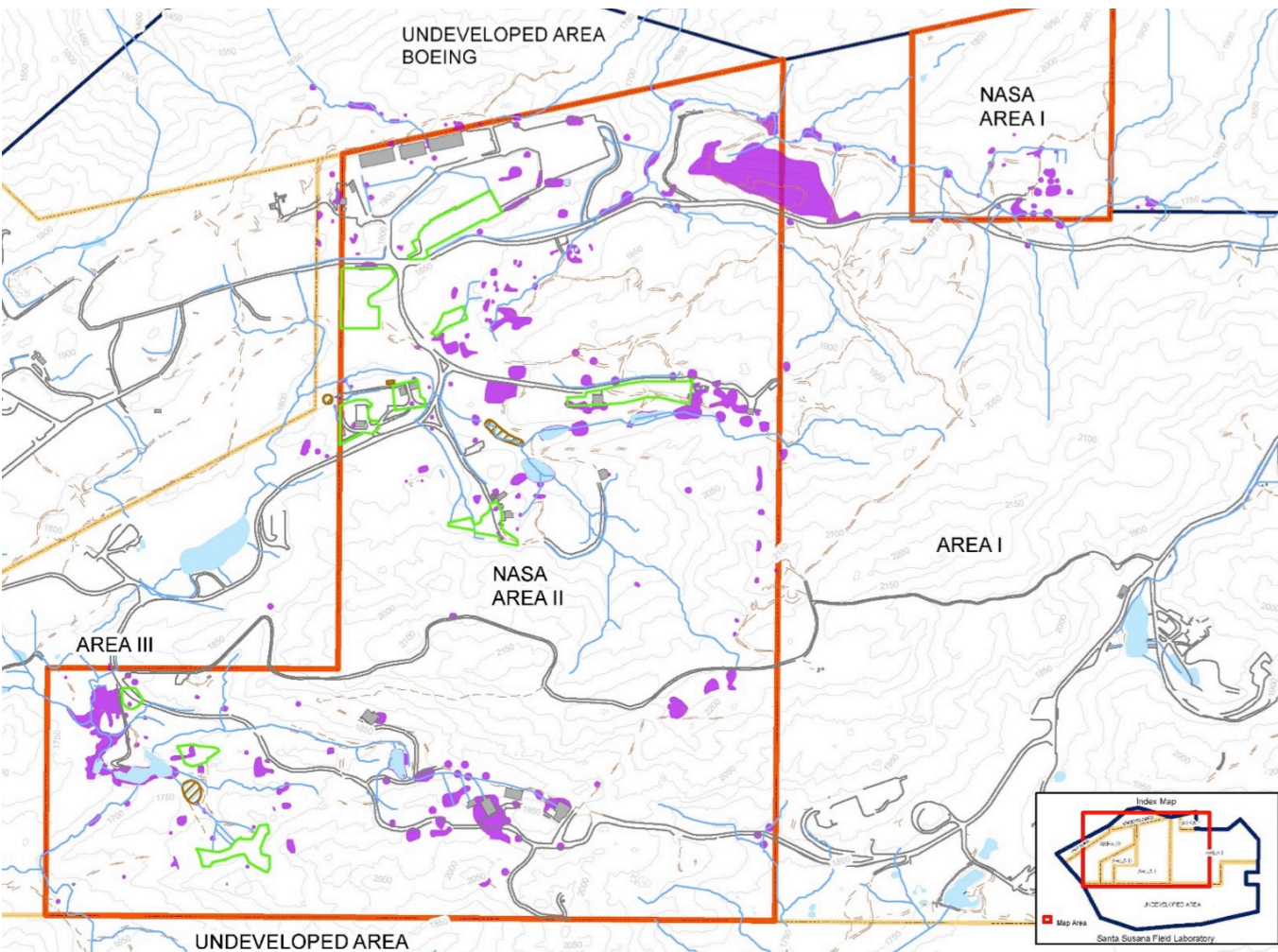




Despite Claiming That There is
Much MORE Contamination Than
It Had Previously Realized, NASA
Now Proposes To Clean up FAR
LESS Than It Had Promised



Areas that
NASA had
originally
committed to
clean up



Current
proposal of
what NASA
intends to
clean up

BOEING HAS ALSO BROKEN ITS CLEANUP COMMITMENTS



Boeing had long promised to clean up its parts of SSFL to a residential standard, as defined in a 2007 cleanup agreement with the dept. Of toxic substances control. It has now broken those commitments and wants to instead clean up only to a far less protective recreational standard.

BOEING'S PROPOSAL WOULD LEAVE
HUNDREDS OF TIMES HIGHER
CONCENTRATIONS OF CONTAMINANTS



~98%

OF BOEING'S
CONTAMINATED
SOIL WOULDN'T
GET CLEANED
UP

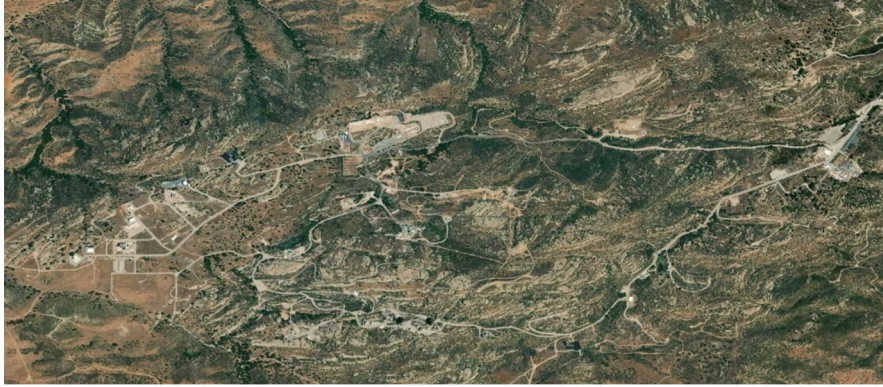
This is consistent with Boeing's conduct that led to the hundreds of deaths from its 737 Max airplanes: putting its profits above public safety, and fighting against regulation by agencies that would require it to act to protect public safety.

DOE, NASA, AND BOEING'S SCARE TACTICS



- Inflated, without supporting data, the amount of soil excavation, and assumed excavation always needed down to bedrock
- Inflated number of truck trips and ignored alternative methods of transportation as well as haul routes that don't go through neighborhoods
- Ignored numerous viable methods for on-site cleanup (soil vapor extraction, thermal desorption, bioventing, etc.), which would require fewer trucks
- Inflated number of years needed to complete AOC cleanup, from 2 years to 25+

WOOLSEY FIRE AT SSFL NOV. 8 2018



If the SSFL Contamination Had
Been Cleaned Up As Promised
by 2017, There Wouldn't Have
Been Concern that the 2018
Woolsey Fire That Began at
SSFL Could Have Spread
Contamination.

Woolsey Fire Began at SSFL



Twitter Post by Stu Mundel, KCBS-KCAL, November 8, 2018

The fire began just South of NASA's ELV Complex and near Southern Cal. Edison's substation and the nuclear meltdown site



Chatsworth
Substation

SRE: Sodium Reactor Experiment, 1957

© 2018 Google

Google Earth

1990

34°14'02.09" N 118°42'13.02" W elev 1816 ft eye alt 3612 ft

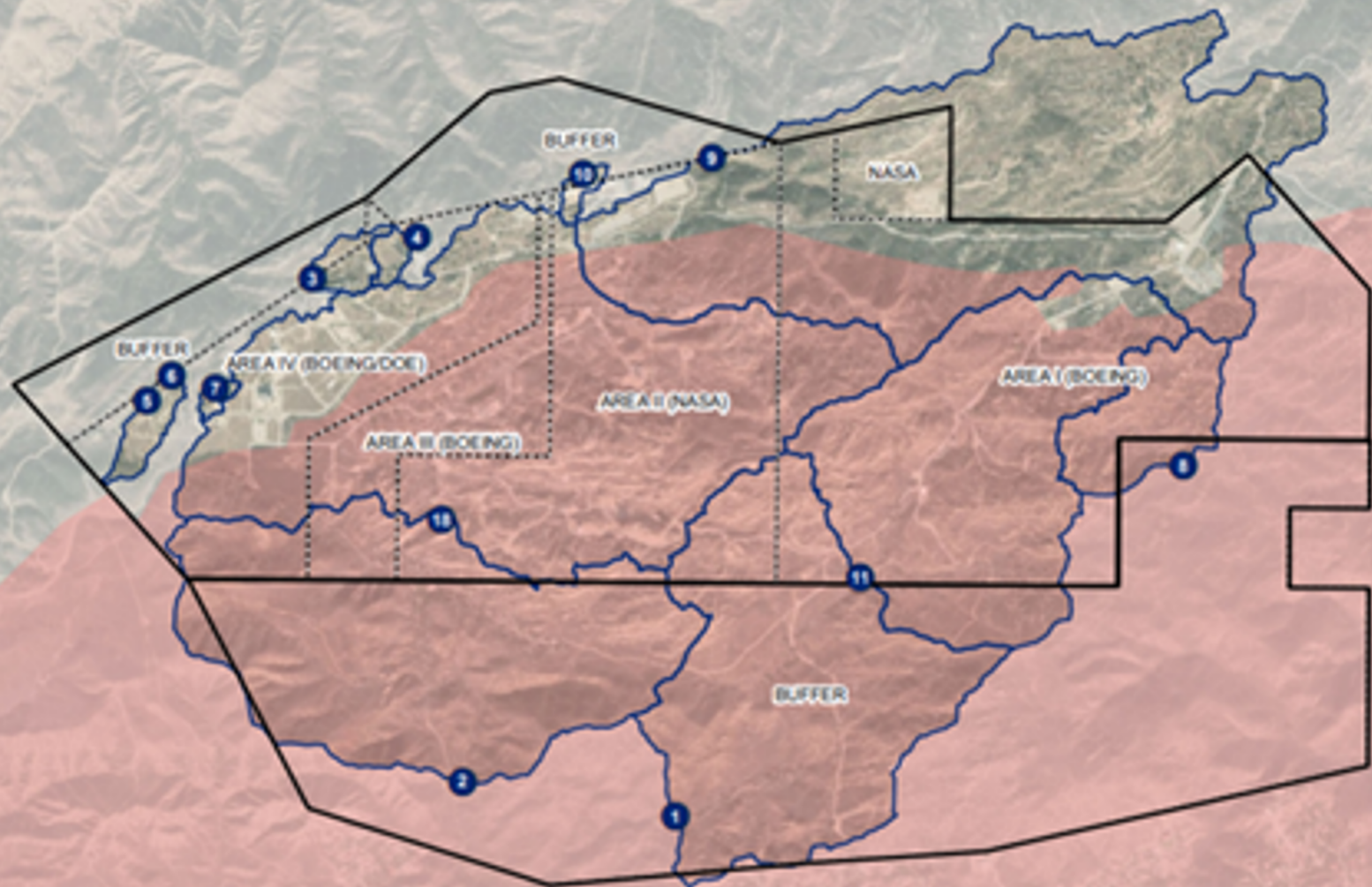


© 2018 Google

Google Earth

1994

34°14'12.07" N 118°42'09.49" W elev 1861 ft eye alt 2058 ft



Woolsey Fire Damage Assessment

Ventura County Sheriff - Office of Emergency Services





THE LA TIMES HAS REVEALED THAT

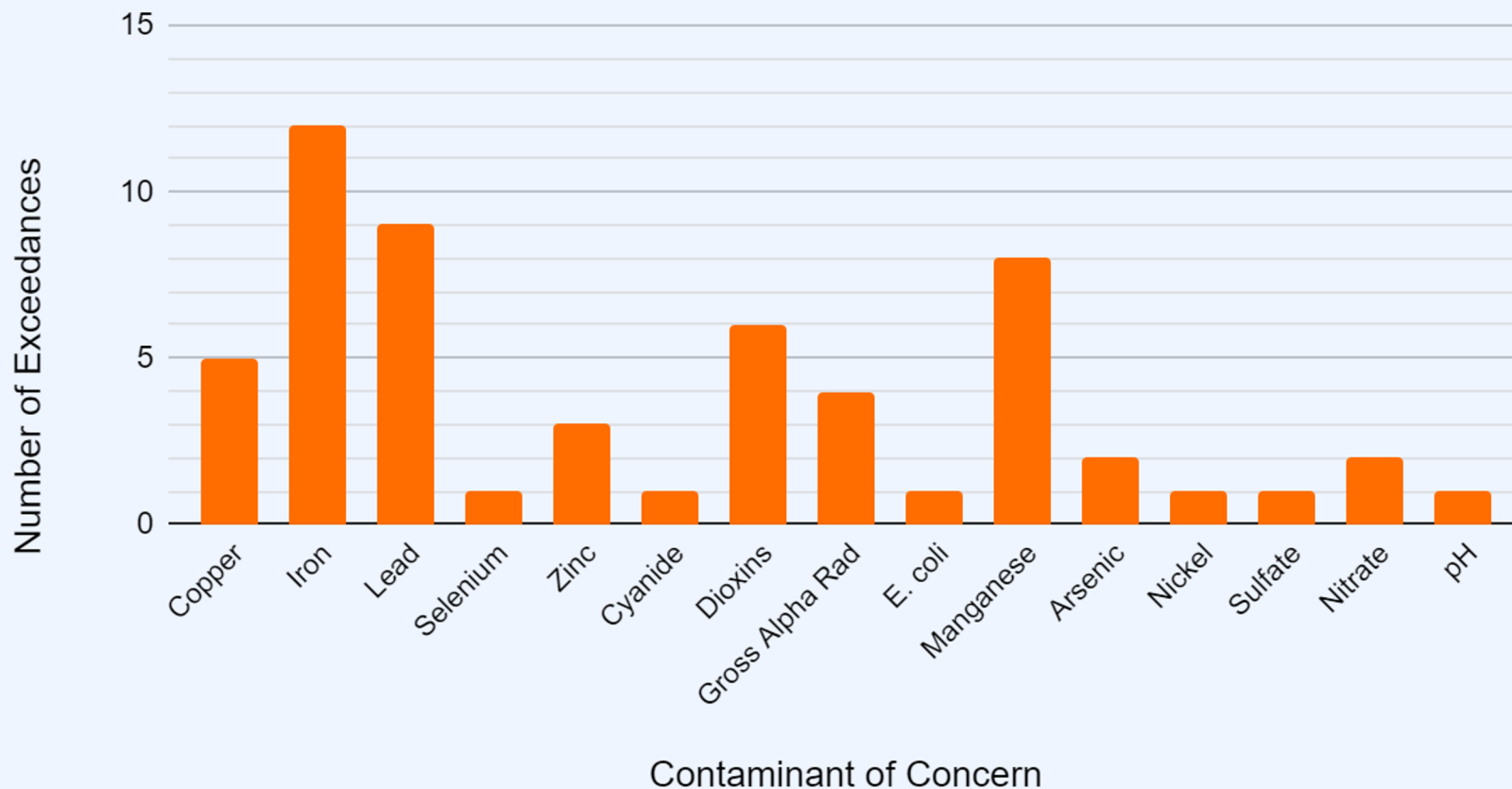


the Boeing fire engine broke
down before it could even
reach the fire.

There were, however, **57**
exceedances of pollution
limits in surface water leaving
SSFL in the period after and
attributed to the Woolsey Fire

Number of Reported Exceedances per Contaminant

Data collection period: December 2018 - March 2019

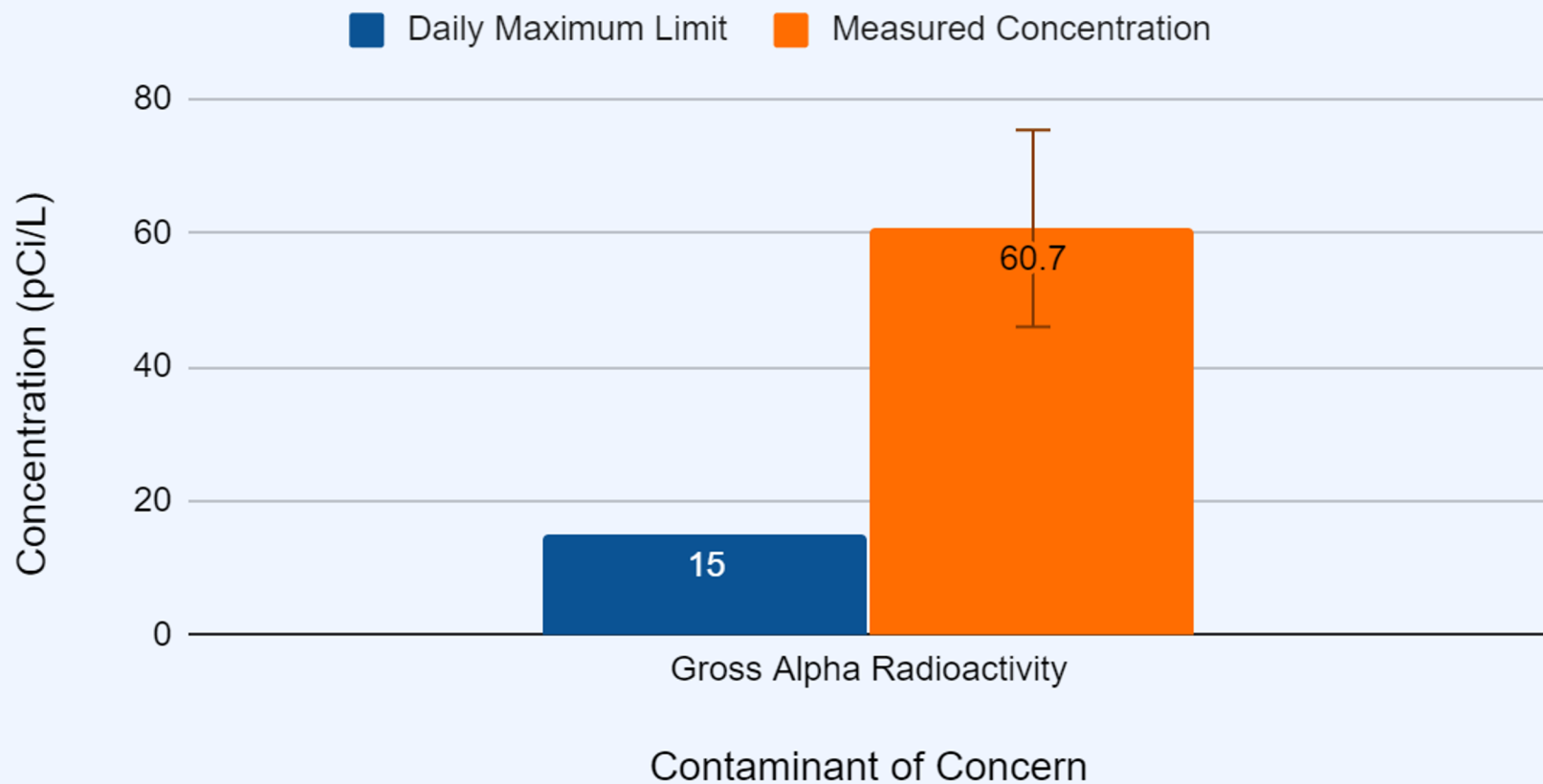


The Contaminants
Detected Above Permit
Limits/Benchmarks
Were:

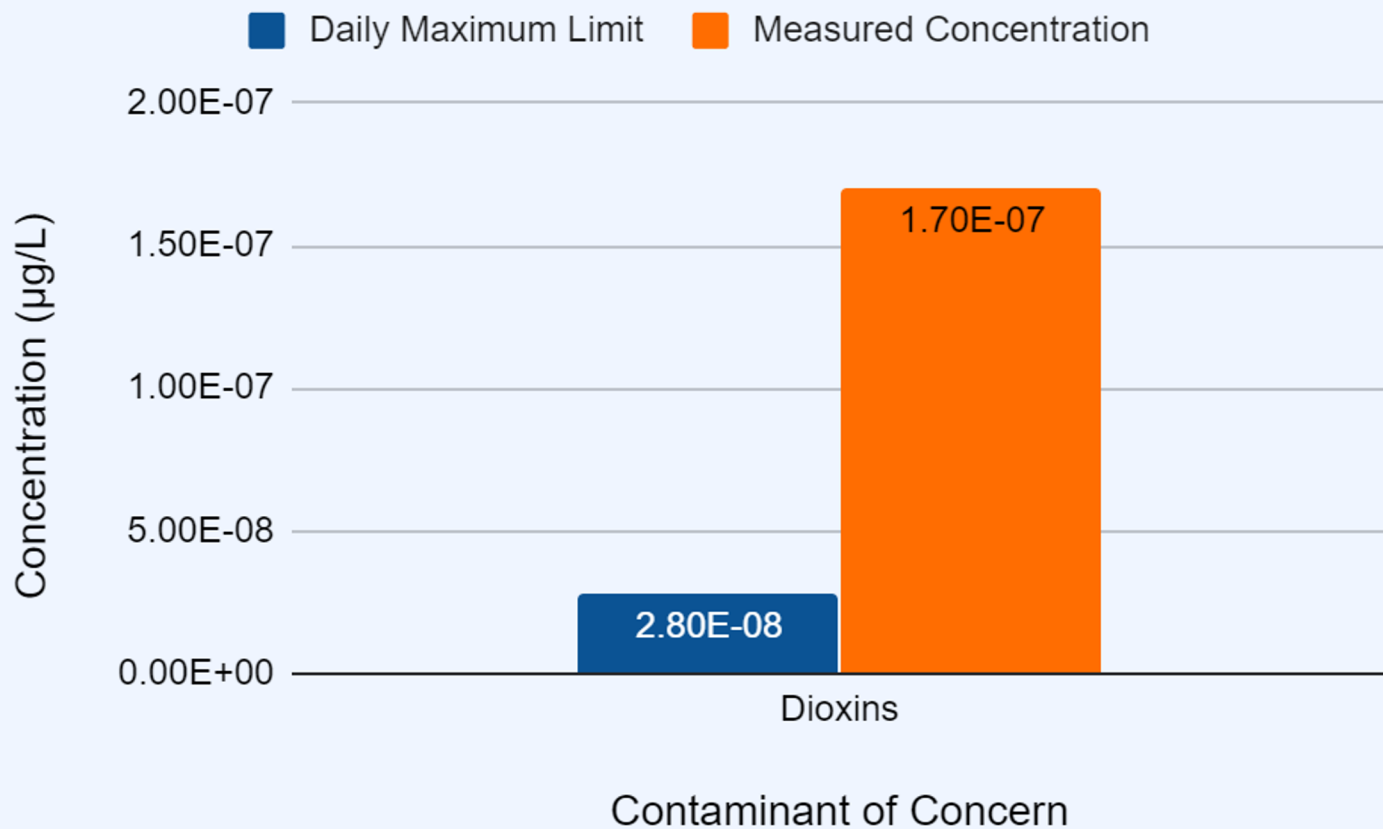
- Copper
- Iron
- Lead
- Selenium
- Zinc
- Cyanide
- Dioxins (TCDD TEQ)
- Gross Alpha
- Radioactivity
- E. Coli
- Manganese
- Arsenic
- Nickel
- Sulfate
- Nitrate

Contaminant	Regional Water Quality Control Board Limit	Reported Exceedance Value	How much larger was the exceedance than the limit?
Copper	14 µg/L	52 µg/L	4 times the limit
Iron	0.3 mg/L	98 mg/L	327 times the limit
Lead	5.2 mg/L	88 mg/L	17 times the limit
Selenium	8.2 µg/L	11 µg/L	1.3 times the limit
Zinc	119 µg/L	430 µg/L	4 times the limit
Cyanide	9.5 µg/L	15 µg/L	1.6 times the limit
Dioxins	2.8E-08 µg/L	1.7E-07 µg/L	6 times the limit
Gross Alpha	15 pCi/L	60.7±14.7 pCi/L	4 times the limit
E. Coli	235 MPN/100mL	5,300 MPN/100mL	23 times the limit
Manganese	50 µg/L	920 µg/L	18 times the limit
Arsenic	10.0 µg/L	17 µg/L	1.7 times the limit
Nickel	86 µg/L	170 µg/L	2 times the limit

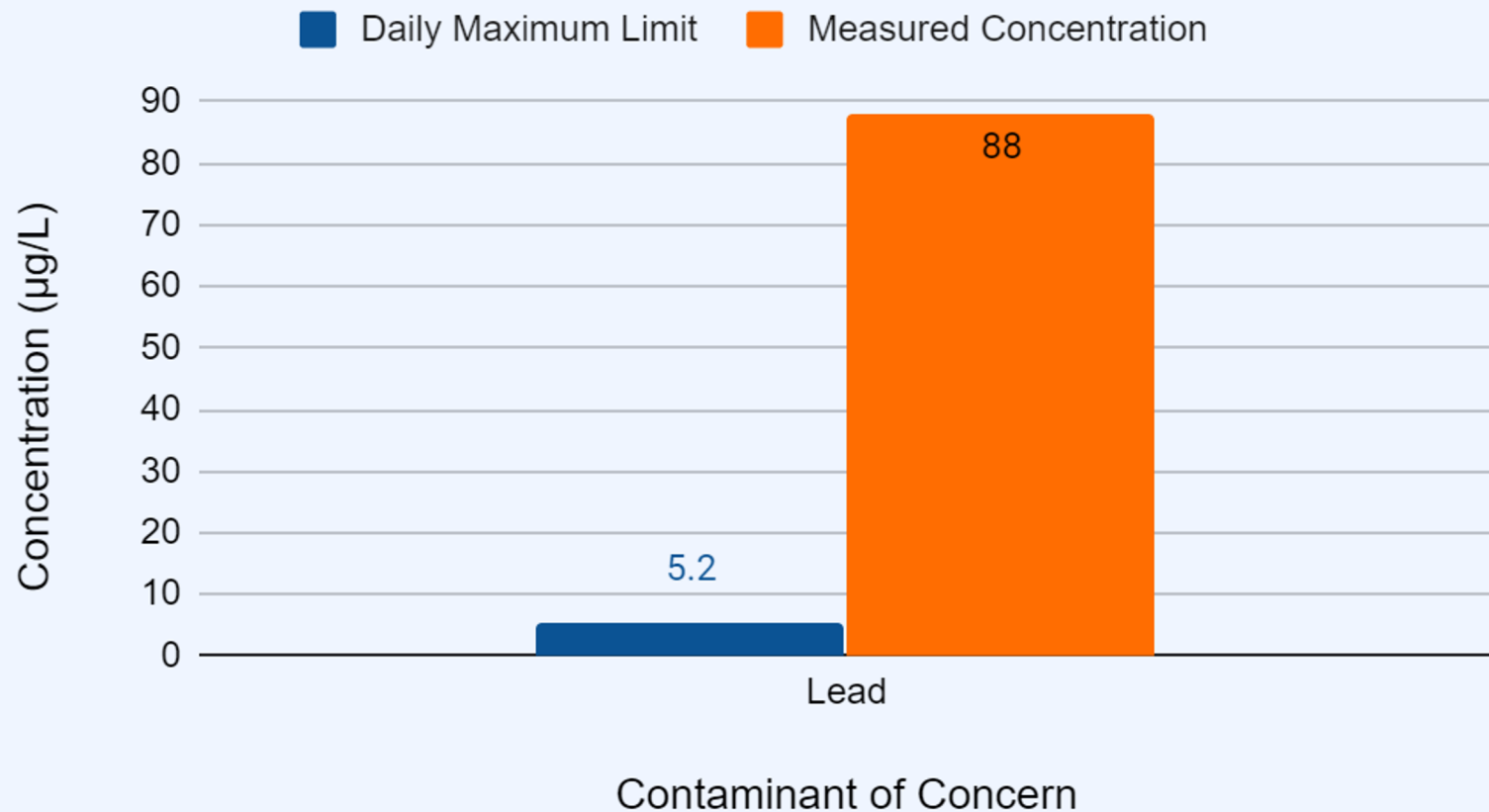
Maximum Measured Concentration of Contaminant versus Concentration Limit



Maximum Measured Concentration of Contaminant versus Concentration Limit



Maximum Measured Concentration of Contaminants versus Concentration Limits



SSFL CONTAMINATION LEAKS OFFSITE AND WILL CONTINUE TO DO SO UNTIL CLEANED UP



Although exceedances of pollution limits increased markedly after the Woolsey Fire, SSFL contamination has migrated offsite for years-- approximately 350 exceedances over the previous decade.

Until SSFL is fully cleaned up, as required by the cleanup agreements executed by the parties responsible for the contamination, there there will be continuing risk of contaminants migrating offsite.

Conclusions



There are two alternative versions of the Golden Rule. We must choose by which one we live our professional and personal lives.

One protects those with the gold.

The other protects the Graces and Hazels of this world.

May we choose well.



<https://www.facebook.com/groups/TeamGraceEllen/>



Source: <https://www.facebook.com/ourlittlehazelnut/>